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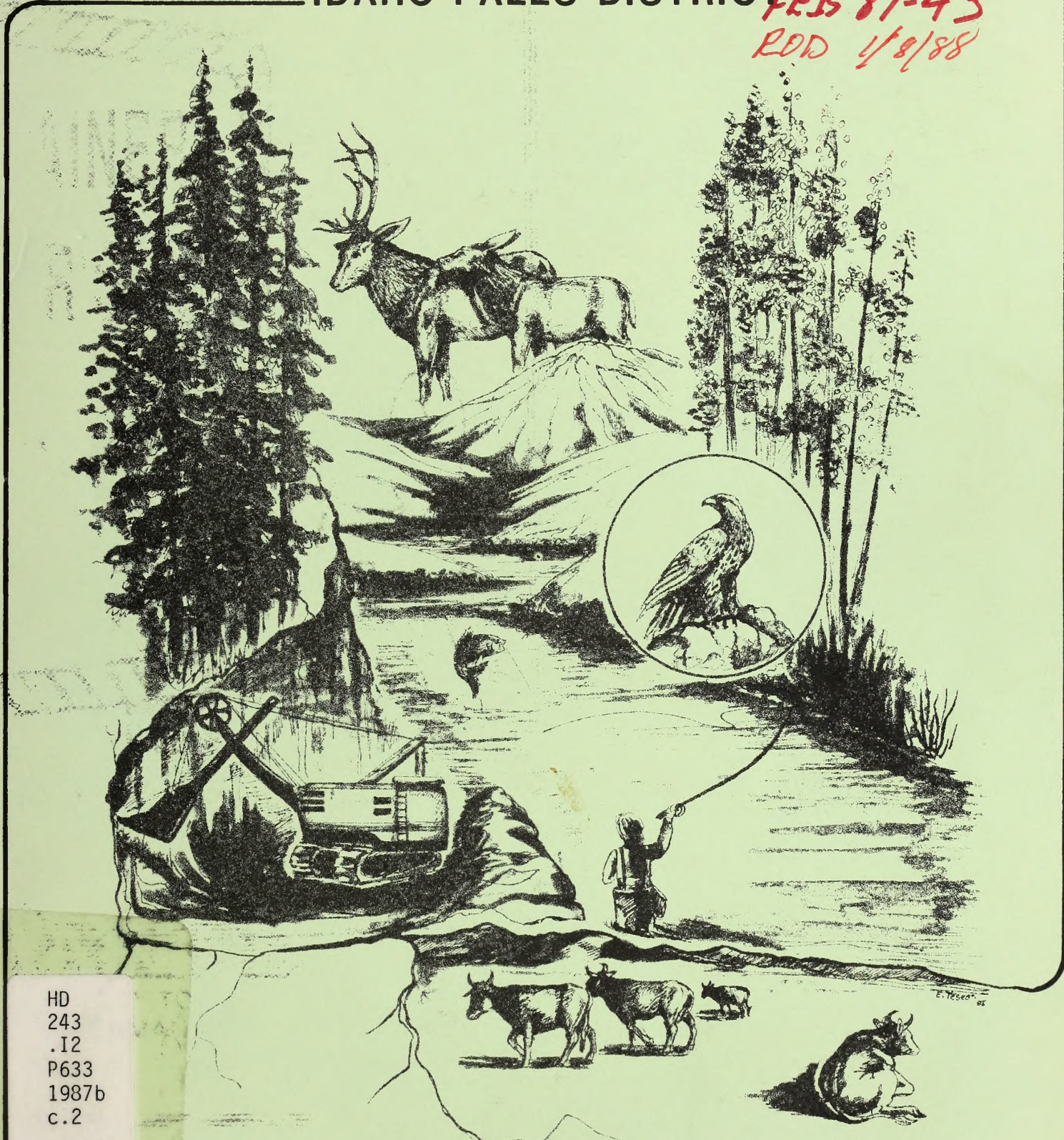
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PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT IDAHO FALLS DISTRICT

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POCATELLO PROPOSED RESOURCE MANAGEMENT PLAN

AND

ENVIRONMENTAL IMPACT STATEMENT

FINAL

Bannock, Bear Lake, Bingham, Bonneville,
Caribou, Franklin, and Power Counties
State of Idaho

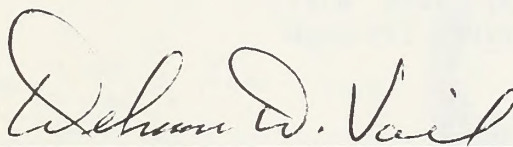
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Prepared by

Department of the Interior

Bureau of Land Management

Idaho Falls District



Delmar D. Vail
State Director, Idaho

Pocatello Resource Management Plan
and
Environmental Impact Statement

Draft

Final

Lead Agency

U.S. Department of the Interior, Bureau of Land Management

Type of Action

Administrative

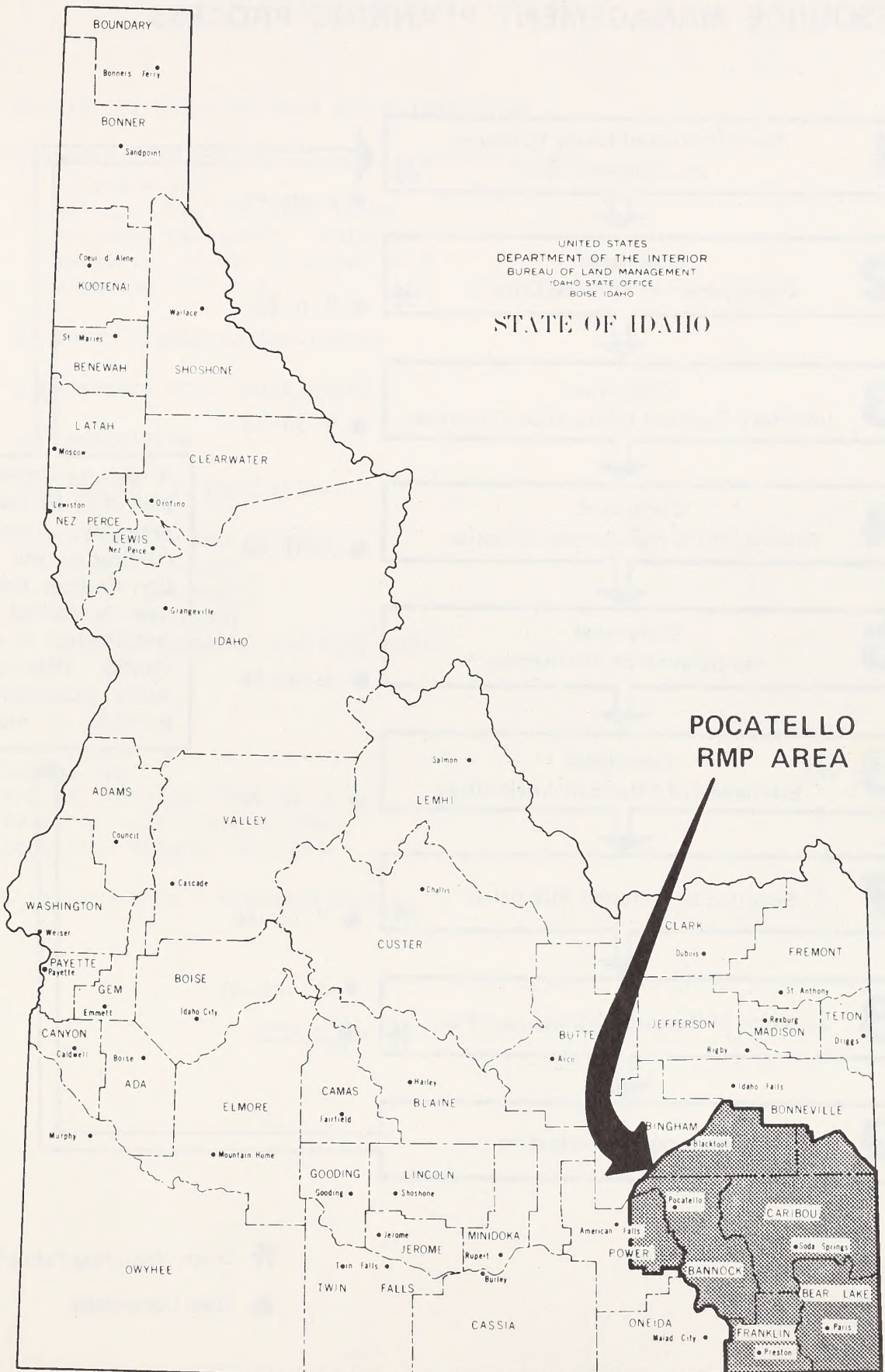
Legislative

Abstract

This resource management plan and environmental impact statement describes and analyzes five alternative plans for managing 264,481 acres of BLM - administered surface lands and 648,901 acres of Federal mineral estate in the Pocatello Resource Area of the Idaho Falls District. Alternative A would continue present management. Alternative B, the Proposed Plan, would allow production and use of commodity resources while protecting natural systems for nonconsumptive resource uses. Alternative C would emphasize increases in commodity production, consumptive uses and more intensive development. Alternative D emphasizes nonconsumptive uses, favors wildlife and fisheries habitat enhancement, recreational values, cultural resource management, and watershed protection. Alternative E emphasizes mineral development on the public lands. The objective is to manage the Federal mineral estate to allow optimum exploration and development, while minimizing unnecessary impacts to other resources.

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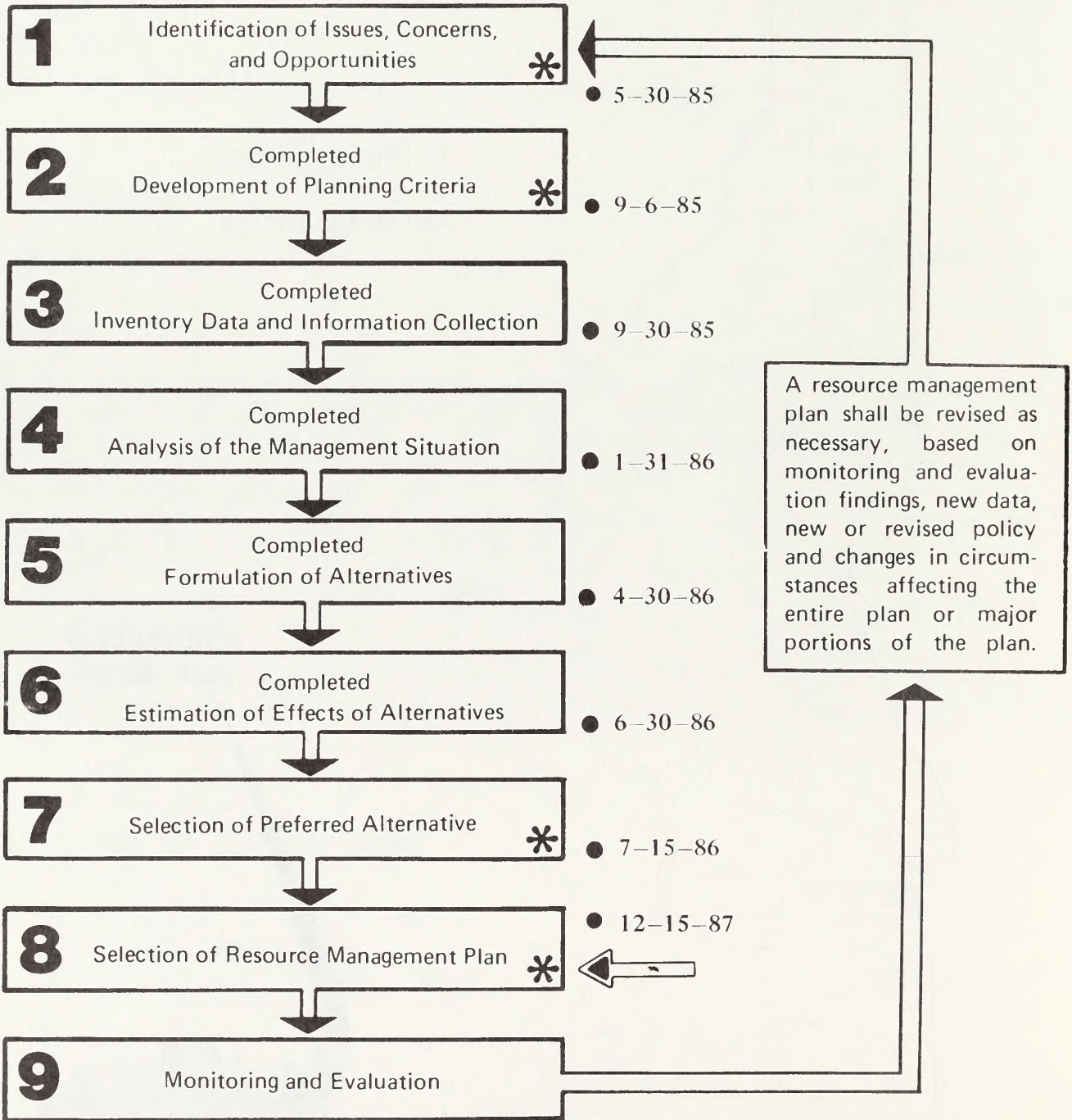


UNITED STATES
 DEPARTMENT OF THE INTERIOR
 BUREAU OF LAND MANAGEMENT
 IDAHO STATE OFFICE
 BOISE IDAHO

STATE OF IDAHO

**POCATELLO
 RMP AREA**

STEPS IN THE RESOURCE MANAGEMENT PLANNING PROCESS



A resource management plan shall be revised as necessary, based on monitoring and evaluation findings, new data, new or revised policy and changes in circumstances affecting the entire plan or major portions of the plan.

- * Steps Requiring Public Participation
- Date Completed

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SUMMARY OF PROPOSED PLAN AND ALTERNATIVES

The Pocatello Resource Management Plan RMP is being prepared to provide the Bureau of Land Management, Idaho Falls District Office, with a comprehensive framework for managing 264,481 acres of BLM-administered public land over the next 15 or more years. With increasing demands for various resources, prudent stewardship of public lands can no longer be accomplished without comprehensive land use planning.

The Pocatello Draft RMP/EIS published January 1987 was divided into three parts.

Part I of this document is the Draft Resource Management Plan for the Pocatello Resource Area, Idaho Falls District (see Map 1 for location).

Part II of this document is the Environmental Impact Statement which deals with the expected environmental impacts associated with the alternatives. Each alternative represents a possible plan for the Pocatello Resource Area. Alternative B is the preferred alternative.

Part III, Appendix, consists of specific data on which Part I and Part II are based. More detailed information is available for inspection at the Idaho Falls District Office.

This Proposed Plan and Final Environmental Impact Statement uses an abbreviated format. The BLM considered all of the comments received by letter and at two hearings (refer to Public Comment and Review). After a thorough review of the Draft and an analysis of all of the comments, BLM has chosen to adopt Alternative B, with some minor additions and corrections, as the proposed plan for the area. Alternative B was identified in the Draft RMP/EIS as BLM's Preferred Alternative. Table S.1 shows outputs or actions for all of the alternatives analyzed and a narrative summary follows.

ISSUES

The following planning issues were identified through public participation. The issues presented here are those that received major emphasis in the public responses and that require a land use decision in the RMP.

Two of the issues primarily dealt with BLM policy. As a result, these issues were addressed in the Standard Operating Procedures section of this document. These two issues are: the Control of Grasshoppers and Noxious Weeds on Public Lands and Shoshone-Bannock Off-Reservation Rights.

Availability of Lands for Phosphate, Competitive and Non-Competitive Leasing and Oil and Gas Leasing.

1. What public lands are open to leasing?
2. What is the mineral potential of the public lands open to leasing?

3. What special restriction should be placed on mineral leasing to protect other resources?

Mineral Development

1. Should specific public lands be closed to mineral development and exploration?
2. What special conditions should be placed on mineral exploration and development?

Land Ownership Adjustments

1. What public lands should be transferred out of public ownership or consolidated with other public lands?
2. What should be done with isolated public land tracts?
3. Which public lands have rights-of-way restrictions?

Rangeland Management

1. How should the range resource be managed to meet existing and future livestock demands?
2. How much forage should be designated for livestock use?
3. What special conditions should be placed on livestock grazing?

Protection of Wildlife Habitat

1. How should the range resource be managed to meet existing and future wildlife demands?
2. How much forage should be designated for wildlife use?

Off-Road-Vehicle use on Public Lands

What areas should be designated as open, closed, or limited to motorized vehicles?

Timber and Firewood Utilization

1. Should any areas be closed to timber harvesting?
2. Should restrictions be placed on timber harvesting?

Protection of Riparian Habitat and Water Quality

1. Which riparian areas need to be improved and which maintained?

2. What special management conditions should be placed on riparian areas?

Legal and Physical Access to Public Lands

1. What public lands need public access?
2. How many acres of public land would be made available to the public as a result of acquiring additional access?

ALTERNATIVES

Five alternatives were considered in developing the Pocatello RMP. These alternatives comply with the National Environmental Policy Act and address the issues identified. One alternative considered but not developed for the RMP was the No Grazing Alternative. The alternatives, general guidelines for developing alternatives, key management actions, and a brief discussion of alternatives are discussed below.

Alternative A

This alternative represents the existing situation and serves as the baseline for analyzing other alternatives. The present level of management on the public lands would be continued, while measures would be taken to prevent or correct deteriorating conditions. Any changes in management would be brought about through monitoring studies and the environmental analysis process. All proposed changes would be handled on a case by case basis.

As defined by BLM policy, Alternative A is the proposed alternative for livestock grazing. However, Alternative B has been selected as the proposed plan.

Management Action Summary

A total of 604,064 acres would be open to non-energy leasables (phosphate) and 38,895 acres would be closed. There would be 354,508 acres open to fluid mineral leasing, 329,687 acres open to fluid mineral leasing with seasonal and standard stipulations, and 24,821 acres open with No-Surface-Occupancy restrictions. A total of 38,895 acres would be closed to fluid mineral leasing. A total of 330,250 acres would be open to locatable mineral entry and 57,211 acres closed. For mineral materials, 318,857 acres would be open and 68,604 acres closed.

Approximately 22,229 acres would be identified for disposal (transfer out of public ownership) through sale, exchanges or the Recreation and Public Purposes Act process. About 242,252 acres would be identified for retention in Federal ownership. Approximately 228,322 acres would be open for rights-of-way application.

Alternative A would provide 24,061 AUMs of livestock forage in the short-term (1-5 years) and 24,361 AUMs in the long-term.

Alternative A would provide forage for 516 elk and 6,748 deer. Approximately 78,007 acres of big game range would be maintained in satisfactory condition.

Under this Alternative, 198,350 acres would be designated open to ORVs, 320 acres would be closed, and there would be 65,811 acres with limited restrictions.

Approximately 13,467 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. There would also be 28,210 acres of woodlands available for public use.

Under Alternative A, 87.97 miles of stream would be managed to maintain existing fisheries, water quality and riparian habitat in current satisfactory condition. An additional 3.15 miles of stream would be improved.

Environmental Consequences Summary

In Alternative A, the acres of land available for mineral development would remain the same. There would be a moderate decrease in the acres of land retained in public ownership. There would be a moderate increase in livestock AUMs and range condition would remain basically the same. There would be no changes in wildlife habitat conditions and forage would be available for existing populations. Water quality would continue to decrease in areas currently in a downward trend. Recreation opportunities would remain the same.

Alternative B (Proposed Plan)

This alternative represents a mix of resource uses that takes a balanced approach to public land management. Production and use of commodity resources and commercial use authorizations would occur, but fragile resources, wildlife habitat, cultural values, and other nonconsumptive resource uses would be protected. It would require funding at approximately the present level.

Management Action Summary

A total of 598,581 acres would be open to non-energy leasables and 44,378 acres would be closed. There would be 354,508 acres open to fluid mineral leasing, 324,009 acres open with seasonal and standard stipulations and 30,499 acres open with no-surface-occupancy restrictions. A total of 38,895 acres would be closed to fluid mineral leasing. A total of 329,273 acres would be open to locatable mineral entry and 58,188 acres closed. For mineral materials, 311,793 acres would be open and 75,668 acres closed (refer to Appendix J).

Approximately 17,068 acres would be identified for disposal through sale, exchange or the R&PP process. About 247,413 acres would be identified for retention. Approximately 191,561 acres would be open for rights-of-way application.

Alternative B would provide 29,969 AUMs of livestock forage in the short-term and 34,276 AUMs in the long-term.

Alternative B would provide forage for 543 elk and 7,105 deer. Approximately 82,138 acres of big game range would be maintained in satisfactory condition.

Under this Alternative, 75,115 acres would be designated open to ORVs, 3,537 acres would be closed, and 185,829 acres would have limited restrictions.

Approximately 13,255 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. There would also be 28,011 acres of woodlands available for public use.

Under Alternative B, 70.89 miles of stream would be managed to maintain existing fisheries, water quality, and riparian habitat in the current satisfactory condition. An additional 22.70 miles of stream would be improved.

Under Alternative B, public access would be obtained to approximately 37,300 acres of public land.

Environmental Consequences Summary

Under Alternative B, there would be a minor decrease in the amount of land available for minerals development. There would be a minor decrease in lands available for transfer from Federal ownership. Range conditions would improve due to vegetation manipulations and range improvements. Livestock AUMs would show a moderate increase. Deer and elk numbers would increase. There would also be a minor increase in big game habitat. Acres designated open for ORVs would decrease and increase for limited designation. Commercial forest lands available for management would increase. There would be a moderate increase in water quality, fisheries, and riparian condition. Economic conditions would improve over the existing situation with a possible increase of 32 jobs. Resource management efficiency would be improved through increased legal access without significantly increasing adverse environmental consequences.

Alternative C

Alternative C favors production and use of commodity resources and commercial use authorizations. Management direction would favor higher livestock stocking levels, more range improvements, land disposal for agricultural development, and transfer of isolated or difficult to manage parcels out of Federal ownership. Restrictions on mining, mineral leasing, mineral material removal, and ORV use would be minimized.

Management Action Summary

A total of 604,064 acres would be open to non-energy leasable and 38,895 acres would be closed. There would be 361,508 acres open to fluid mineral leasing, 332,587 acres open with seasonal and standard stipulations, and 28,921 acres open with No-Surface-Occupancy. A total of 31,895 acres would be closed to

fluid mineral leasing. A total of 330,250 acres would be open to locatable mineral entry and 57,211 acres closed. For mineral materials, 313,788 acres would be open and 73,673 acres closed.

Approximately 23,098 acres would be identified for disposal through sale, exchange or R&PP process. About 241,383 acres would be identified for retention. Approximately 221,521 acres would be open for rights-of-way application.

Alternative C would provide 31,251 AUMs of livestock forage in the short-term and 36,990 AUMs in the long-term.

Alternative C would provide forage for 510 elk and 6,662 deer. Approximately 77,019 acres of big game range would be maintained in satisfactory condition.

Under this Alternative, 198,350 acres would be designated open to ORVs, 320 acres would be closed, and 65,811 acres would have limited restrictions.

Approximately 10,757 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. There would also be 26,706 acres of woodlands available for public use.

Under Alternative C, 64.04 miles of stream would be managed to maintain existing fisheries, water quality, and riparian habitat in current satisfactory condition. No additional miles of stream would be improved.

Access would be acquired to approximately 37,300 acres of public land.

Environmental Consequences Summary

Under Alternative C, there would be a minor increase in the amount of land available for minerals management. There would be a moderate increase in lands available for transfer from Federal ownership. Range condition and livestock AUMs would show a moderate increase. Deer and elk numbers would decrease. There would also be a minor decrease in big game habitat. Acres designated open for ORVs would increase and decrease for limited designation. Commercial forest lands available for management would decrease. There would be a decrease in water quality, fisheries, and riparian condition. Economic conditions would show an increase for the area, same as Alternative B.

Alternative D

Alternative D emphasizes wildlife and fisheries habitat enhancement, recreational values, cultural resources management, and watershed protection.

Management Action Summary

A total of 598,581 acres would be open to non-energy leasables and 44,378 acres would be closed. There would be 354,508 acres open to fluid mineral leasing, 313,799 acres open with seasonal and standard stipulations, and

40,709 acres open with No-Surface-Occupancy. A total of 38,895 acres would be closed to fluid mineral leasing. A total of 329,273 acres would be open to locatable mineral entry and 58,188 acres closed. For mineral materials, 301,583 acres would be open and 85,878 acres closed.

Approximately 8,124 acres would be identified for disposal through sale, exchange, or the R&PP process. About 256,357 acres would be identified for retention. Approximately 178,916 acres would be open for rights-of-way application.

Alternative D would provide 28,840 AUMs of livestock forage in the short-term and 29,519 AUMs in the long-term.

Alternative D would provide forage for 554 elk and 7,243 deer. Approximately 83,731 acres of big game range would be maintained in satisfactory condition.

Under this Alternative, 22,676 acres would be designated open to ORVs, 47,972 acres would be closed, and 193,833 acres would have limited restrictions.

Approximately 13,255 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. There would also be 28,210 acres of woodlands available for public use.

Under Alternative D, 59.64 miles of stream would be managed to maintain existing fisheries, water quality, and riparian habitat in current satisfactory condition. An additional 34.15 miles of stream would be improved.

Access would be acquired to approximately 37,300 acres of public land.

Environmental Consequences Summary

Under Alternative D lands available for minerals management would decrease. There would be a decrease in lands available for transfer from Federal ownership. Range conditions would improve and livestock AUMs would show a minor decrease. Deer and elk numbers would increase. There would also be a minor increase in big game habitat. Acres designated open for ORVs would decrease and increase for limited designations. Commercial forest lands available for management would remain about the same. There would be a major increase in water quality, fisheries, and riparian conditions. The economic conditions project an increase over the existing situation, but a decrease when compared to Alternatives B, C and E.

Alternative E

Alternative E emphasizes mineral development on the public lands. The objective is to manage the Federal mineral estate to allow optimum exploration and development, while minimizing unnecessary impacts to other resources.

Management Action Summary

A total of 614,578 acres would be open to non-energy leasables and 28,381 acres would be closed. There would be 361,508 acres open to fluid mineral leasing, 332,587 acres open with seasonal and standard stipulations, and 28,921 acres open with No-Surface-Occupancy. A total of 31,895 acres would be closed to fluid mineral leasing. A total of 330,250 acres would be open to locatable mineral entry and 57,211 acres closed. For mineral materials, 313,788 acres would be open and 73,673 acres closed.

Approximately 17,585 acres would be identified for disposal through sale, exchange, or the R&PP process. About 246,896 acres would be identified for retention. Approximately 221,521 acres would be open for rights-of-way application.

Alternative E would provide 29,969 AUMs of livestock forage in the short-term and 34,276 AUMs in the long-term.

Alternative E would provide forage for 555 elk and 7,251 deer. Approximately 83,822 acres of big game range would be maintained in satisfactory condition.

Under this Alternative, 198,350 acres would be designated open to ORVs, 320 acres would be closed, and 65,811 acres would have limited restrictions.

Approximately 10,757 acres of public forest land would be open to commercial harvest under existing regulations, restrictions, and stipulations. There would also be 27,106 acres of woodlands available for public use.

Under Alternative E, 83.84 miles of stream would be managed to maintain existing fisheries, water quality, and riparian habitat in the current satisfactory condition. An additional 6.75 miles of stream would be improved.

Access would be acquired to approximately 37,300 acres of public land.

Environmental Consequences Summary

Under Alternative E, there would be an increase in the amount of land available for minerals management. There would be a decrease in lands available for transfer from Federal ownership. Range conditions would increase and livestock AUMs would show a minor increase. Deer and elk numbers would increase slightly due to improvements. Acres designated open for ORVs would be the same as Alternatives C. Commercial forest lands available for management would also be the same as Alternative C. There would be a minor increase in water quality, fisheries, and riparian condition over the existing situation. The economic conditions would improve over the existing situation.

TABLE S.1
ALTERNATIVE SUMMARY TABLE

Management Objective/Action	(Existing) Alternative A	(Preferred) Alternative B	(Production) Alternative C	(Protection) Alternative D	(Minerals) Alternative E
MINERALS MANAGEMENT					
A. Leasable Minerals					
1) Non-Energy Leasables					
Acres Closed	38,895	44,378	38,895	44,378	28,381
Non-Discretionary	28,381	28,381	28,381	28,381	28,381
Discretionary	10,514	15,997	10,514	15,997	0
Acres Open	604,064	598,581	604,064	598,581	614,578
2) Fluid Leasables Oil and Gas/Geothermal					
Acres Closed	38,895	38,895	31,895	38,895	31,895
Non-Discretionary	28,381	28,381	28,381	28,381	28,381
Discretionary	10,514	10,514	3,514	10,514	3,514
Acres Open	354,508	354,508	361,508	354,508	361,508
No Surface Occupancy	24,821	30,499	28,921	40,709	28,921
Seasonal and Standard Stipulations	329,687	324,009	332,587	313,799	332,587
B. Locatable Minerals					
1) Acres Closed to Entry	57,211	58,188	57,211	58,188	57,211
Congressional	0	0	0	0	0
Executive Branch Agency	51,015	51,015	51,015	51,015	51,015
BLM	6,196	7,173	6,196	7,173	6,196
2) Acres Open to Entry	330,250	329,273	330,250	329,273	330,250
C. Mineral Materials					
1) Acres Closed to Disposal:					
Non-Discretionary	68,604	75,668	73,673	85,878	73,673
Discretionary	66,155	66,155	66,155	66,155	66,155
2) Acres Available for Disposal	2,449	9,513	7,518	19,723	7,518
	318,857	311,793	313,788	301,583	313,788
LANDS					
A. Disposal Areas					
Total Disposal (Sales, exchanges and R&PP)(Acres)	22,229	17,068	23,098	8,124	17,585
B. Retain in Public Ownership (Acres)					
	242,252	247,413	241,383	256,357	246,895
C. Leases/Permits (Acres)					
	403	403	1,270	222	222
D. Acquire (Acres)					
	3,554	19,567	27,367	21,527	9,754
E. Acres Available for Rights-of-Way (ROW)					
Applications					
1) Open to ROW Application	228,322	191,561	221,521	178,916	221,521
2) Open with Restriction	24,821	42,251	31,622	40,231	31,622
3) Closed to ROW Application	11,338	30,669	11,338	45,334	11,338
RANGE MANAGEMENT					
A. Areas of Grazing Use					
1) Available Acreage	212,098	217,728	227,201	209,974	218,174
2) Closed/Restricted Acreage	10	1,810	307	1,810	500
3) Unallotted Acreage	15,400	7,200	0	15,400	7,200
4) Unsuitable Acreage	23,566	23,566	23,566	23,566	23,566
B. Range Improvements					
1) Brush Control/Seeding (Acres)	0	11,240	17,600	0	11,240
2) Water Facilities (Each)	20	54	76	76	54
3) Fences (Miles)	8	10	45	82	10
4) Acres of Disturbed Restored	100	1,500	800	1,500	800
C. Preference					
1) Active (AUMs)	29,151	29,151	29,151	29,151	29,151
2) AUM Change after Implementation	24,061	29,969	31,251	28,840	29,969
3) Percent Change from Existing	1/(-17.5%) 2/0%	(+2.3%) +20%	(+7%) +23.1%	(-1.1%) +16.5%	(+2.8%) +19.8%
4) Future (+15 Years)	24,361	34,276	36,990	29,519	34,276
5) Future % Change from Existing	(-16.5%) +1.3%	(+13%) +30%	(+21.2%) +35%	(+2.4%) +18.5%	(+12.6%) +29.9%
D. Allotment Categorization					
1) Maintain	88	88	88	88	88
2) Improve	168	168	168	168	168
3) Custodial	159	159	159	159	159
WILDLIFE MANAGEMENT					
A. Numbers of Animals					
1) Elk	516	543	510	554	555
2) Mule Deer	6,748	7,105	6,662	7,243	7,251
B. Habitat Acres					
1) Big Game Winter Range:					
Satisfactory	78,007	82,138	77,019	83,731	83,822
Unsatisfactory	6,100	3,682	8,801	1,991	4,353
2) Sage Grouse					
Satisfactory	62,310	63,320	58,470	65,526	63,678
Unsatisfactory	7,355	5,640	10,450	3,394	5,722
3) Sharptail Grouse					
Satisfactory	23,867	26,072	25,789	26,170	26,072
Unsatisfactory	3,130	3,245	3,528	3,174	3,245
C. Wildlife Improvements					
1) Water Sources (Guzzlers)	2	2	2	2	2
2) Fences (Miles)	4	6	4	6	6
3) Bitterbrush Planting (Acres)	40	417	417	597	417
4) Goose Nest Platforms	4	6	4	- 13	6

1/ (%) is percent change from active preference 29,151.
2/ % is change from actual use 24,061.

TABLE S.1 (cont'd)
ALTERNATIVE SUMMARY TABLE

Management Objective/Action	(Existing)	(Preferred)	(Production)	(Protection)	(Minerals)
	Alternative A	Alternative B	Alternative C	Alternative D	Alternative E
RECREATION MANAGEMENT					
A. Off-Road Vehicle Designations					
1) Open	198,350	75,115	198,350	22,676	198,350
2) Closed	320	3,537	320	47,972	320
3) Limited	65,811	185,829	65,811	193,833	65,811
B. Special Designations					
1) ACECs	0	4,506(3)	4,506(3)	4,506(3)	4,506(3)
2) RNAs	0	1,494(7)	1,494(7)	1,494(7)	1,494(7)
3) SRMAs	0	64,532(2)	64,532(2)	64,532(2)	64,532(2)
C. Visual Resource Management Classes					
1) Class I	11,338	11,338	11,338	11,338	11,338
2) Class II	99,055	99,055	27,800	115,055	27,800
3) Class III	141,266	141,266	51,960	125,266	51,960
4) Class IV	12,822	12,822	173,383	12,822	173,383
D. Developed Recreation Sites					
1) Number of Developed Recreation Sites	9	17	23	17	23
2) New Miles of Developed Multiple Use Trails	0	6	6	6	6
CULTURAL RESOURCE MANAGEMENT					
A. No Surface Occupancy (Acres)					
1) Historic R.R. Grade	5	10	5	20	5
2) Blackrock Canyon	10	40	10	640	10
3) Historic Trail Segments	40	2,000	40	11,600	40
B. Sensitive Areas (Acres)					
1) Prehistoric Area A	80	280	80	280	80
2) Indian Rocks	40	370	40	370	40
3) Prehistoric Area B	80	1,200	80	4,620	80
4) Upper Valley	120	520	120	1,600	120
5) Prehistoric Area C	40	280	40	280	40
6) Prehistoric Area D	10	40	10	280	10
7) Bear Lake Plateau	40	320	40	3,500	40
8) Prehistoric Area E	80	240	80	1,840	80
9) Prehistoric Area F	5	40	5	40	5
10) Prehistoric Area G	600	3,400	600	8,840	600
FOREST MANAGEMENT (Acres)					
A. Commercial Forest Land (CFL)					
1) TPCC Withdrawal	1,279	1,279	1,279	1,279	1,279
2) Deferred Lands (depending on Congress' decision)					
Petticoat Peak and Worm Creek WSAs	2,559	2,559	2,559	2,559	2,559
3) Available for Restricted Management	12,659	11,369	9,949	11,369	9,949
4) Available CFL Without Restrictions	808	808	808	808	808
5) CFL Managed to Enhance Other Uses	0	1,078	0	1,078	0
6) Proposed Harvest Levels (1000 Board feet/year)	350-400	350-400	250-300	350-400	250-300
B. Available Woodland	28,210	28,011	26,706	28,210	27,106
C. Withdrawn Woodlands (Petticoat Peak WSA)	5,069	5,069	5,069	5,069	5,069
RIPARIAN AND WATER QUALITY					
A. Miles of stream managed primarily for improvement of stream condition and maintenance of water quality.					
	3.15	22.70	0	34.15	6.75
B. Miles of stream to be maintained in present condition					
	87.97	70.89	64.04	59.64	83.84
C. Miles of stream that would exhibit a downward trend					
	2.75	1.40	29.75	0	3.20
D. Miles of fencing needed to improve stream condition					
	6.75	9.75	0	13.20	7.25
E. Miles of inventoried stream disposed of as a result of Lands actions					
	3.57	3.65	3.65	3.65	3.65
WILDERNESS					
Implement Congress' Decision on the Petticoat Peak and Worm Creek WSAs					
Petticoat Peak	11,298				
Worm Creek	40				
	11,338 Acres				
SOILS AND WATERSHED MANAGEMENT					
A. Erosion Controls					
1) Juniper Cutting Areas	0	500	1,000	300	600
2) Protect Oneida Narrows	948	948	948	948	948
3) Protect Ashy Soils	0	360	0	1,360	360
4) Woodall Mountain and Trail Creek (Reclamation)	52	224	314	224	600
FIRE MANAGEMENT					
1) Full Suppression	264,481	253,143	253,143	253,143	253,143
2) Limited Suppression		1/ 11,338	11,338	11,338	11,338
3) Prescribed Burning	0	11,240	17,600	0	11,240

1/ Petticoat Peak and Worm Creek WSAs will be managed under the Interim Management Policy.

INTRODUCTION

This Proposed Plan and Environmental Impact Statement uses an abbreviated format. The proposed Pocatello Resource Management Plan is the land use plan for the BLM resource area over the next 15 or more years. After BLM considered all of the comments received by letter and at 2 public hearings, Alternative B, with some minor additions and corrections, has been chosen as the proposed plan for the resource area.

Plan Approval

The Pocatello RMP will be approved by the State Director no sooner than 30 days after the Environmental Protection Agency (EPA) publishes a notice of filing of the final EIS in the Federal Register and pending final action on any protest that may be filed. Approval will be withheld on any portion of the RMP being protested until final resolution has been completed on such protest. Before the RMP is approved, public notice will be given if there is a significant change made to the proposed Pocatello RMP and the public will have the opportunity to comment on the change. Approval of the RMP will be documented in a record of decision meeting the requirements of the National Environmental Policy Act of 1969 (NEPA).

Protest Provision

The procedures for raising a protest about the proposed Pocatello RMP are contained in 43 CFR 1610.5-2, which is reprinted in its entirety below.

1610.5-2 Protest procedures.

(a) Any person who participated in the planning process and has an interest which is or may be adversely affected by the approval or amendment of a resource management plan may protest such approval or amendment. A protest may raise only those issues which were submitted for the record during the planning process.

(1) The protest shall be in writing and shall be filed with the Director. The protest shall be filed within 30 days of the date the Environmental Protection Agency published the notice of receipt of the final environmental impact statement containing the plan or amendment in the Federal Register. For an amendment not requiring the preparation of an environmental impact statement, the protest shall be filed within 30 days of the publication of the notice of its effective date.

(2) The protest shall contain:

- (i) The name, mailing address, telephone number and interest of the person filing the protest;
- (ii) A statement of the issue or issues being protested;
- (iii) A statement of the part or parts of the plan or amendment being protested;
- (iv) A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the record; and
- (v) A concise statement explaining why the State Director's decision is believed to be wrong.

(3) The Director shall promptly render a decision on the protest. The decision shall be in writing and shall set forth the reasons for the decision. The decision shall be sent to the protesting party by certified mail, return receipt requested.

(b) The decision of the Director shall be the final decision of the Department of the Interior.

Protests should be filed with the Director (760), Bureau of Land Management, U.S. Department of the Interior, Washington, D.C. 20240.

Governor's Review

The Governor of the State of Idaho has an opportunity to review this Pocatello RMP for consistency with State and local plans, policies, and programs. The Governor has 60 days from the date this document is filed with EPA to identify any inconsistencies and provide written recommendations to the State Director, Bureau of Land Management, 3380 Americana Terrace, Boise, Idaho 83706.

Changes in the Proposed Plan

The following changes are a result of addition errors, typing errors or additions to aid clarity. They do not significantly change the analysis portion of the document.

Map 3 - One exchange parcel was not identified on Map 3. See Map B3 revised in this document for addition.

Page 4-37 Third paragraph, should read as follows: Approximately 19.37 miles of fishery streams, or 37 percent of the fishery streams inventoried, would be expected to improve; 0.25 miles would continue to deteriorate and 32.97 miles would remain unchanged.

Page 4-36 Fourth paragraph, 3rd, 4th and 5th sentences: change 20.15 to 22.70; change 59 to 66; change 8.25 to 9.75.

Page 4-36 Sixth paragraph, 1st sentence: change 2.75 to 1.40.

Page 4-28 Top of page, add the following:

Turner Canal	.25 miles	Allotment #4117
Crow Creek	.30 miles	Allotment #4269
Jones Creek	.80 miles	Allotment #4423
Wolverine Creek	1.20 miles	Allotment #4094

Total would change from 20.15 to 22.70.

Page 4-28 Second paragraph, 2nd sentence:
Change 20.15 to 22.70
Change 122 to 137
Change 26 to 30.

Page 4-26 Add the following to Minerals:
5. Approximately 977 would be proposed for withdrawal from mining claim location.

Page 4-25 Fourth, 5th and 6th paragraphs, Locatable Minerals; replace with the following:

Locatable Minerals

Lands open to mining claim location total 329,273 (85 percent) (977 less than A) (Appendices: Map 3, Alternative B, and Map 11).

The lands open to mining claim location total 329,273 acres (85 percent) (see Table 4.1). There are no Congressional withdrawals affecting location. Other executive branch closures total 51,051 acres. BLM closures would total 7,173 acres, and include 5,188 acres with high potential and 971 acres with moderate potential for locatable minerals.

Executive branch closures total 51,015, 13 percent. In addition, there are 7,173 acres, or 2 percent, with BLM closures. The BLM closures include 5,188 acres, or 2 percent, with high potential and 971 acres, less than .3 percent, with moderate potential for locatable minerals.

The BLM closures with high potential (above what's been covered in Alternative A) include the following areas:

Oneida Narrows and Robbers Roost (approximately 500 acres), Geologic indicator such as anomalies, mines, prospects, and deposits are present. Possible minerals are gold, copper, silver, lead, manganese, and tungsten.

The impact associated on mineral availability are slightly more than Alternative A but still considered minor in nature. No surface discoveries have been reported.

The 43 CFR 3802 and 3809, Surface Management Regulations, give BLM authority to regulate mining and exploration for locatable minerals. Environmental assessments would be written for all plans of operation.

Page 4-5 Table 4.1, Locatable Minerals, Alternative B:

Closed - change 57,211 to 58,188
change 6,196 to 7,173
change 914 to 1,014
change 594 to 971
change 4,688 to 5,188

Open - change 330,250 to 329,273
change 65,355 to 65,255
change 196,400 to 196,023
change 68,495 to 67,995.

Page 3-16 Second paragraph, should be replaced with the following:

Excessive livestock utilization on riparian areas has existed in the past. The PRA inventoried a total of 97.44 miles, or 75 percent, of the riparian habitat in the resource area. Some of the inventoried riparian habitat receives heavy livestock use and other areas are totally inaccessible to livestock.

Page 2-27 Table 2.5, Alternative B, Locatable:
 Open - change "No change to Decrease (minor)
 Closed - change "No change to Increase (minor).

Page 2-10 Fifth paragraph:
 Change two and three-fourths to 1.40
 Change 8.25 to 9.75
 Change 20.15 to 22.70.

Page 2-6 Fifth paragraph, 1st and 2nd sentences:
 Change 330,250 to 329,273
 Change 57,211 to 58,188.

Page S-10 Table S.1, Riparian and Water Quality, Alternative B:
 Change 20.15 to 22.70
 Change 2.75 to 1.40
 Change 8.25 to 9.75.

Page S-9 Table S.1, Alternative B, Locatable Minerals:
 Change 57,211 to 58,188
 Change 6,196 to 7,173
 Change 330,250 to 329,273.

Page S-5 Fourth paragraph, 3rd and 4th sentences:
 Change 7.89 to 70.89
 Change 20.15 to 22.70.

Page S-4 Eighth paragraph, 4th sentence:
 Change 330,250 to 329,273
 Change 57,211 to 58,188.

Page S-4 Ninth paragraph, last sentence:
 Change 17,078 to 17,068.

Page S-3 Fourth paragraph, 1st sentence:
 Change preferred to proposed.

Page 40 Second paragraph, 1st sentence:
 Change 20.15 to 22.70.

Page 36 Fourth paragraph, last sentence:
 Change 15,720 to 9,880.

Page 35 Fifth paragraph, 1st sentence:
 Change 330,250 to 329,273.

Page 34 Fourth paragraph, 3rd sentence:
 Change 330,250 to 329,273.

Page 34 Fourth paragraph, 4th sentence:
 Change 0.4 to 0.3.

- Page 34 Fifth paragraph, 1st and 2nd sentences:
Change 20.15 to 22.70
Change 2.75 to 1.40
Sixth paragraph, last sentence:
Change 81,037 to 75,115
Seventh paragraph, last 2 sentences:
Change 20.15 to 22.70
Change 2.75 to 1.40.
- Page 32 Third paragraph, last sentence:
Change 330,250 to 329,273.
- Page 31 First paragraph, Required Management Action, add the following new paragraph:
If at any time in the future an activity or development is proposed on the BLM administered 340 acre parcel east of Formation Springs, the BLM will coordinate the analysis of the proposal with the City of Soda Springs.
- Page 30 Fifth paragraph, 1st sentence:
Change 20.15 to 22.70
Sixth paragraph, last sentence
Change 8.25 to 9.75.
- Page 28 Research Natural Areas (RNAs)
All references towards RNAs in the document should be changed to RNA/ACEC. All seven RNAs will carry a dual designation, RNA/ACEC.
- Page 24 Fifth paragraph, 5th sentence:
Change 330,250 to 329,273
Change 57,211 to 58,188.
- Page 21 Fifth paragraph, "Moderate Use Class", 1st sentence:
Change 101,141 to 107,058.

Appendices Changes

- Page A-30 Management Alternatives, 3rd paragraph, change "Cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-32 Management Alternatives, 5th paragraph, change "Cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-34 Management Alternatives, 1st paragraph, change "Cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-40 Management Alternatives, 5th paragraph, change "Cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-49 Management Alternatives, 1st and 4th paragraphs, change "Cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-57 Management Alternatives, 5th paragraph, change "If grazing use exceeds 50% utilization on key forage plants, cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page A-58 Management Alternatives, 5th paragraph, change "If grazing use exceeds 50% utilization on key forage plants, cancel all" to "To meet objectives, evaluate conditions on the ground and consider reducing".
- Page C-4 Allotment #, 4th number, 4117 should be 4117 (I).
- Page C-7 Allotment #, 5th number, 4269 should be 4269 (I).
- Page C-12 Allotment #, 6th number, 4423 should be 4423 (I).

Format

Management Objectives and Required Management Actions are described for the Pocatello Resource Area. Additional materials are provided in this document to clarify the proposed decisions for the reader. A land status map is located in a pocket on the back cover (Map B1) and the reverse side (Map B2) shows the Utility Corridors. Map B3 and Map B4 are maps that show areas of restrictions to protect special resource values. Map 3 (revised) shows the Multiple Use and Transfer Areas. Please refer to your Draft document for additional resource specific maps.

MULTIPLE USE AND TRANSFER CLASSES

The RMP has been broken down into the following multiple use or transfer classes: intensive use/development, moderate use, limited use, or transfer. Multiple use and transfer classes are general planning categories included in Idaho RMPs to provide Statewide consistency and uniformity.

Multiple use and transfer classes serve two purposes in this plan. The first is to describe overall opportunities and constraints by indicating what level of resource production and use is appropriate, what intensity of management is needed, whether there are sensitive and significant resources that must be protected, and whether BLM would consider transfer of public lands from its jurisdiction. The second purpose is to provide a basis for considering unexpected proposals by supplementing the detailed resource management objectives and required actions established for the PRA with general purpose and policy statements. This feature is intended to help keep the plan responsive to future demands and to reduce the number of future plan amendments that otherwise might be needed.

Prior to undertaking or approving any proposed resource management action on public lands in the PRA, BLM will ensure that such action is consistent with the purposes and policies of the multiple use or transfer class or classes involved.

The multiple use classes assigned to the RMP are shown on Map 2B. Public lands are placed in the multiple use or transfer class that best reflects the specific resources and management priorities for the area. The multiple use and transfer classes described for the RMP pertain only to the surface acreage managed by the BLM. A description of these classes and their purposes and policies is given in the following sections.

Moderate Use Class

A total of 107,058 acres are classified as moderate use in this Proposed RMP.

Purpose

The purpose of a moderate use class is to delineate public lands that are suitable for a wide variety of existing and potential uses.

Policy

The first priority for managing a moderate use class is to provide for the production or use of forage, timber, minerals and energy, recreation, or other consumptive resources while maintaining or enhancing natural systems. These areas will be managed for a moderate intensity of use and

will generally be available for production and use of consumptive resources, subject to BLM standard operating procedures and other controls as needed. Sensitive and significant resource values, however, will be protected consistent with Federal and State law. Public lands in a moderate use class will be retained in Federal ownership.

Limited Use Class

A total of 137,350 acres are classified as limited use in this Proposed RMP.

Purpose

The purpose of a limited use class is to delineate public lands where strict environmental controls are required to protect sensitive and significant resources.

Policy

The first priority for managing a limited use class is to protect key wildlife habitat, scenic values, wilderness, cultural resources, watershed, and other sensitive and significant resources while providing for other compatible uses. These areas will be managed for relatively low intensities of use and with strict environmental controls to protect sensitive and significant values. A limited use class may be closed to or contain restrictions on off-road-vehicle use, mineral and energy exploration and development, forest management practices, location of utility corridors and installations, and livestock grazing. Because of the relatively significant environmental considerations in these areas, some uses may not be permitted. Special attention will be given to finding appropriate locations for compatible uses. Public lands in a limited use class will be retained in Federal ownership.

Intensive Use/Development Class

A total of 2,930 acres are classified as intensive use/development and another 75 acres are proposed for intensive use/development in this Proposed RMP. These sites and acreages are shown on Table 2.

Purpose

The purpose of an intensive use/development class is to delineate areas suitable for large-scale intensive use and development.

TABLE 2
INTENSIVE USE/DEVELOPMENT SITES

<u>Existing</u>	<u>Acres</u>	<u>Proposed</u>	<u>Acres</u>
Dike Lake	35	Upper Blackfoot River	40
Goodenough Cr.	5	Trail Creek Bridge	5
Henry Mine	560	Harkness Canyon	5
Stauffer Mine	240	Blackrock Canyon	5
Conda Mine	1,160	Chinks Peak Hang gliding Site	5
Sagehen Flat	5	Blackrock Canyon Winter Trail	5
Graves Creek	5	Walker Creek Loop Trail	5
Cutthroat Trout	5	Morgans Bridge	5
Wolverine Creek	5	Total:	<u>75</u>
Caribou Ski Area	120		
Moonlight Mtn. Yurt	20		
Howard Mtn. Comm. Sites	520		
Chinks Peak Sites	120		
Fish Cr . Comm. Sites	40		
Garden Creek Comm. Site	20		
Taylor Mtn. Comm. Sites	50		
Stump Creek Comm. Sites	<u>20</u>		
Total:	<u>2,930</u>		

Policy

The first priority for managing an intensive use/development class is to provide for existing and projected demands for large-scale intensive use and development. Intensive use areas are generally reserved for major recreation sites or facilities, off-road-vehicle intensive use areas, large-scale mineral or energy extraction operations, military use areas, or major utility installations. These areas will be managed for a high intensity of use. Because of the potential for conflict with other uses in these areas, some uses may not be permitted. Protection of sensitive and significant resources, however, will be ensured, consistent with Federal and State law. Public lands in an intensive use/development class will be retained in Federal ownership.

Transfer Class

A total of 17,068 acres are classified for transfer in this Draft RMP.

Purpose

The purpose of a transfer class is to delineate public lands that may be considered for transfer out of Federal ownership.

Policy

The transfer class is the class in which public lands may be transferred out of Federal ownership under this plan. Public lands declared eligible for transfer by their inclusion in this category are subject to detailed consideration prior to the final decision regarding transfer. Transfer classes are delineated in response to specific developments, community expansion, and other transfers, including transfers to the State of Idaho. Transfer classes will be managed on a custodial basis until transferred from Federal jurisdiction. New public investments in these lands will generally be kept to a minimum.

THE PROPOSED MANAGEMENT DECISION

This section identifies resource management objectives and required management actions. The resource management objectives set priorities for managing the various resources. Required management actions identify the management actions, limitations, and other provisions that are needed to accomplish the objectives.

Minerals Management

Management Objective

Manage 648,901 (5,942 acres of this total are managed for oil and gas only) acres of Federal mineral estate (excluding Forest Service and Bureau of Indian Affairs acreage) for mineral and energy exploration and development while minimizing adverse impacts to other resource values.

Required Management Actions

A total of 598,581 acres would be open for non-energy solid minerals (phosphate) leasing. Approximately 44,378 acres would be closed to non-energy solid minerals (phosphate) leasing with 28,381 acres of that total being non-discretionary (National Wildlife Refuges, withdrawals, etc.) and 15,997 acres discretionary (Resource Natural Areas, Area of Critical Environmental Concerns, public land around Grays Lake, etc.).

A total of 324,009 acres would be open for oil and gas leasing with standard stipulations and with seasonal occupancy restrictions. Another 30,499 acres would be open for oil and gas leasing with a NSO restriction. Approximately 38,895 acres would be closed to oil and gas leasing. About 318,067 acres would be available for geothermal leasing with standard stipulations and with seasonal occupancy restrictions, and 30,499 acres would be available with NSO; 38,895 acres would be closed. A total of 329,273 acres would be open for the location of mining claims, while 58,188 acres would be closed to mineral entry. Mineral material (sand and gravel) disposals would be permitted on 311,793 acres; 75,668 acres would be closed.

Lands

Management Objective

Retain a public land base of 247,413 acres for long-term management in Federal ownership and consider 17,068 acres for disposal actions.

Required Management Action

BLM would examine 17,068 acres of public land, applying the standard operating procedures for sales or for State or private exchanges, or for transfer under the Recreation and Public Purposes Act. Included in this total are 8,124 acres that would be considered for transfer solely through exchange.

Land acquisitions would occur through exchanges with private landowners and the State of Idaho. BLM would attempt to acquire 9,687 acres of private land and 9,880 acres of State Land.

A total of 403 acres of public land would be retained and used under existing permits/leases for a ski area, the National Guard and agriculture, and ski yurt system.

Right-of-way development would occur with standard stipulations on 191,561 acres. Restrictions other than standard stipulations would be imposed on 42,251 acres. A total of 30,669 acres would be closed to right-of-way development.

Range Management

Management Objective

Manage 217,728 acres for grazing. Improve 8,957 acres of poor condition range to good and 7,500 acres of fair condition range to good. Provide 34,276 animal unit months (AUMs) of livestock forage in 15 years. Offer 7,200 acres of the 15,400 acres of total unallotted rangeland for lease.

Required Management Actions

The authorized officer would implement adjustments, if needed, in authorized grazing use over a 5 year period through agreements documented in the Range Program Summary or by decision. Grazing adjustments would be made over the 15-year life of the RMP and would occur only after conducting monitoring studies and coordinating with affected users. The initial stocking level of 24,061 AUMs would be below the active preference and is the five-year average use. The long-term stocking level of 34,276 AUMs would be 15 percent above the active preference and 30 percent above the five-year average use. Proposed improvements would include 11,240 acres of brush control/seedings, 54 water facilities, and 10 miles of fences.

Wildlife Management

Management Objective

Provide forage for 7,105 deer and 543 elk. Improve 3,682 acres of elk and deer winter range and 3,126 acres of sage grouse and sharp-tailed grouse seasonal ranges from fair to good ecological range condition. Provide a more consistent water supply on 1,000 acres of deer, sage grouse, and non-game habitat in the Bear Lake Plateau area. Enhance big game movement and safety through fence modifications. Protect the future integrity of the elk breeding area in Brown's Canyon.

Required Management Actions

Eight habitat management plans would be developed on 45,959 acres. Prescribed burning would occur on 7,320 acres of big game range and 40 acres of river habitat. BLM would install 2 guzzlers and fence several areas to improve wildlife habitat (riparian areas). About 6 miles of fence would be modified for big game movement and safety. The quality of 2,700 acres of big game habitat would be improved through restrictions on livestock use and timber management and harvest.

Recreation and Visual Resources

Management Objective

Manage 264,481 acres for ORV designations of either open, closed, or limited.

Continue to manage for dispersed recreation by maintaining existing recreational opportunity settings. Manage the visual resources on lands outside of the Special Recreation Management Areas (SRMAs) to maintain existing scenic qualities. Protect existing and planned investments in developed recreation sites.

Recognize recreation as the principal use of the lands in the two designated SRMAs - the Blackfoot River SRMA and the Pocatello SRMA for a total of 64,532 acres.

Required Management Actions

The two SRMAs would entail mineral withdrawals (Travertine Park RNA/ACEC), restrictions on some nonrecreational uses, and restrictive visual management practices. A recreation area management plan would be written for each SRMA.

Lands open to wheeled vehicle use would be 75,115 acres and over-snow use would be 143,931 acres. Wheeled vehicles would be limited to designated routes and/or existing roads and trails on 185,829 acres where soil erosion is a concern. Over-snow vehicles would be limited on 93,673 acres of big game winter range to designated routes. Areas with

extremely erosive soil, important cultural sites, Areas of Critical Environmental Concern, and Research Natural Areas would be closed to wheeled vehicles on 3,537 acres. Areas closed to over-snow vehicles due to big game winter range would include 26,879 acres.

For visual resource management, the following designations would be made: Class I, 11,338 acres; Class II, 99,055 acres; Class III, 141,266 acres; and Class IV, 12,822 acres.

Wilderness

Management Objective

Manage 11,298 acres of the Petticoat Peak WSA and the 40 acres of Worm Creek WSA under the BLM's Interim Management Policy for Lands Under Wilderness Review, until Congress makes its decision.

Required Management Actions

Continued management under BLM's Interim Management Policy for Lands Under Wilderness Review until Congress makes a decision.

Areas of Critical Environmental Concern (ACEC)

Management Objective

Propose to designate three areas which would include: Stump Creek Ridge (2483 acres), Downey Watershed (1800 acres), and Travertine Park (223 acres) which totals 4,506 acres.

Required Management Actions

Stump Creek Ridge ACEC

- Implement the Stump Creek Habitat Management Plan.
- Establish grazing systems which enhance winter forage for elk.
- Propose a common use allotment by combining some or all of the grazing allotments in the ACEC area.
- Continue snowmobile closure, increase enforcement efforts.
- Rehabilitate winter range through burning or establishment of browse species.
- Discretionary closure for phosphate.
- NSO for oil and gas.
- Requires plan of operation for mining claim development.

Downey Watershed ACEC

- Initiate a grazing management system that will restore native vegetation to good condition.
- Propose combining the Yago Creek and 9 Mile Creek Allotments into a common allotment to provide better opportunities for grazing management.
- Discretionary closure for phosphate.
- NSO for oil and gas.
- Maintain the 1800-acre mineral withdrawal for locatables.

Travertine Park ACEC

- Fence to exclude livestock from the area.
- Sign the area to explain values and the need to protect them.
- Discretionary closure for phosphate.
- NSO for oil and gas.
- Requires plan of operation for mining claim development.

Research Natural Areas

Management Objective

Manage 1,494 acres as RNA/ACECs. This includes seven areas: Cheatbeck Canyon, Dairy Hollow, Formation Cave, Oneida Narrows, Pine Gap, Robbers Roost Creek, and Travertine Park.

Required Management Actions

- Close to ORV use in these areas.
- Eliminate livestock grazing from Dairy Hollow, Pine Gap and Travertine Park by fencing.
- NSO stipulations on leasable mineral activities and proposed withdrawal from mining claim location for all the proposed RNAs.
- Closed to rights-of-way (Exclusion Areas).

Cultural Resource Management

Management Objectives

Manage cultural resources so that representative samples of the full range of scientific and socio-cultural values are maintained consistent with State and Federal laws.

Required Management Actions

Manage thirteen cultural resource management areas which have potential for contributing scientific, historic, or management information. Designate three of these areas as NSO and ten as Sensitive Areas (see Table 3).

TABLE 3
CULTURAL RESOURCE MANAGEMENT AREAS

NO SURFACE OCCUPANCY	<u>Acres</u>
1. Historic Railroad Grade	10
2. Blackrock Canyon	40
3. Historic Trail Segments	2,000
SENSITIVE AREAS	
1. Prehistoric Area A	280
2. Indian Rocks	370
3. Prehistoric Area B	1,200
4. Upper Valley	520
5. Prehistoric Area C	280
6. Prehistoric Area D	40
7. Bear Lake Plateau	320
8. Prehistoric Area E	240
9. Prehistoric Area F	40
10. Prehistoric Area G	3,400

Forest Management

Management Objective

Intensively manage 12,177 acres of restricted and non-restricted commercial forest land under clearcut, shelterwood, and group selection harvest regeneration methods. Manage 1,078 acres of commercial forest land to benefit other resource values. Manage 28,011 acres of woodland for the production of woodland products (firewood, post/poles, etc.).

Required Management Actions

Forest management activities could occur on 13,255 acres of commercial forest land. Of this, 808 acres of predominately lodgepole pine would be managed under a clearcut harvest regeneration method.

The remaining 12,447 acres of predominately Douglas-fir would be available for restricted management or would be managed to enhance other uses. These areas would be harvested under shelterwood or group selection harvest regeneration methods.

Until a decision is made on the Petticoat Peak and Worm Creek WSAs, 2,559 acres of commercial forest land would be placed in a deferred category precluding any forest management activities. In addition, the Timber Productivity Capability Classification Inventory conducted in the District in 1984 withdraws 1,279 acres from timber base for productivity reasons, unstable slopes, and problem regeneration sites.

Approximately 28,011 acres of woodland would be available for management. The Petticoat Peak and Worm Creek WSAs would defer 5,069 acres precluding any woodland management activities in these areas until a designation is made. An additional 500 acres of woodland would be proposed for juniper cutting in the Soda Springs area to alleviate understory erosion.

Riparian and Water Quality

Management Objective

Manage 22.70 miles of stream to improve riparian habitat and water quality. Maintain 70.89 miles of stream in present (fair, good and excellent) condition.

Required Management Actions

Allotment management plans (including riparian) would be written to help evaluate management options in different areas within the PRA. New timber harvest roads would be closed at the completion of timber sales. BLM would fence 9.75 miles of perennial stream riparian area.

Soils and Watershed Management

Management Objective

Manage the PRA to keep soil erosion within tolerable limits (less than 5 tons/acre/year).

Required Management Actions

Monitoring would occur on 22 allotments, identified in Appendix H of the Draft document, for at least three years to determine erosion rates. If erosion rates exceed 5 tons/acre/year, surface disturbing activities would be reduced and livestock grazing adjusted, if necessary. The 948 acres in allotment 0036 would continue unallotted for grazing to protect erodable soils in Oneida Narrows. Reclamation would occur on 224 acres in the Woodall Mountain and Trail Creek mining areas.

If at any time in the future an activity or development is proposed on the BLM administered 340 acre parcel east of Formation Springs, the BLM will coordinate the analysis of the proposal with the City of Soda Springs.

Fire Management

Management Objectives

Manage fire for the protection and enhancement of resource values such as livestock forage, wildlife habitat, and timber.

Required Management Actions

Full suppression fire management guidelines would be followed on 253,141 acres. 11,338 acres would be managed under the limited suppression to maintain wilderness quality. All developed recreation sites and sites that have the potential for development would be under suppression restrictions, i.e., no retardant, no heavy equipment use, and no fireline explosives.

Prescribed burns for vegetation manipulation will be one of the options considered for brush control. At the activity planning stages, actual acres to be burned will be determined. Heavy fuel loading caused by logging debris and dead trees would be reduced by controlled burning to decrease the likelihood of having a disastrous fire.

Access

Approximately 87,900 acres (33 percent) of the public lands in the PRA have legal public access over existing Federal, State and county roads. Throughout the planning process, public access and easements needs to important blocks or tracts of public land were identified. See Table 4.

Required Management Action

The acquisition of 44 miles of road and trail legal access would open another 37,300 acres (17 percent) of public lands in the PRA to the public primarily for recreation purposes and would also support other resource programs (see Table 4)

SELECTION OF THE PROPOSED PLAN

Each alternative included in the Pocatello RMP represents a comprehensive plan for managing all of the public land and resources within the Pocatello Resource Area. Each plan emphasizes a different management philosophy from continuing the present management to significant changes for future management. All of the alternatives meet the requirements of the Federal Land Policy and Management Act (FLPMA). The selection of the Proposed Plan is based on issue resolution, public input, environmental impacts, economic considerations, and resource production.

Social and Economic Values

The Proposed Plan considers social and economic values in all counties in the PRA by providing for land disposal, livestock grazing, mineral development, recreation, and timber harvest. About 17,068 acres of public land would be offered for transfer from Federal ownership. Livestock management would provide 34,276 AUMs of livestock forage over the long-term. A total of 598,581 acres would be open for non-energy solid minerals (phosphate) leasing. A total of 354,508 acres would be open for oil and gas/geothermal leasing and 329,273 acres would be open for location of mining claims.

Approximately 808 acres of public forest land would be available for intensive forest management and 11,369 acres would be available for restricted management. Additionally, 28,011 acres of woodland would be available for management with 5,069 acres of that total being deferred until a decision is made on two wilderness study areas.

The Proposed Plan would increase direct livestock earnings from the existing situation by \$17,300 in the short-term and by \$110,600 in the long-term. This, however, represents only a gain of 0.02 to 0.1 percent on the PRA farm earnings. Direct recreation earnings would increase from the existing situation by \$49,500 or a gain of 0.1 percent in the PRA retail trade earnings. Direct lumber and wood earnings would be decreased from the existing situation by \$23,700. In the long-term, the capital value of AUMs could be increased by as much as \$1.4 million. Improvements needed to implement the Proposed Plan would cost \$365,072.

Plans, Programs, and Policies of Other Federal Agencies, State and Local Governments, and Indian Tribes

BLM's resource management plans must be consistent with officially approved and adopted resource-related plans (or in their absence, policies or programs) of other Federal agencies, State and local governments, and Indian tribes. The Proposed Plan is consistent with all county land use plans. Public input from Federal agencies, State and local governments, and the Sho-Ban Indian Tribe does not indicate that there are any inconsistencies with their plans.

Existing Law, Regulations, and BLM Policy

In the Proposed Plan, there does not appear to be any discrepancy with existing law, regulation, or BLM policy.

Future Needs and Demand for Existing or Potential Resource Commodities and Values

The demand for phosphate ore is expected to remain stable over the short-term and increase slowly over the long-term. Continuing interest in oil and gas leasing and exploration is anticipated in Idaho with a high expectation of an eventual oil or gas discovery. The demand for the livestock grazing resource is high and there is a moderate demand for the timber resource. The Proposed Plan meets or exceeds these demands.

The average use by livestock the past five years has been 24,061 AUMs. While the initial stocking rate would be 29,151 AUMs, the long-term stocking rate would increase to 34,276 AUMs.

Approximately 13,255 acres of public forest land would be open to commercial harvest, with an approximate allowable cut of 0.3 million board feet per year.

Public Input

The Proposed Plan has taken into consideration the concerns of the minerals and energy industry by making lands accessible and available for exploration. Other public concerns have dealt with range resource, wildlife habitat, recreation, lands disposal, and timber harvest. The Proposed Plan provides for the multiple use of all of these resources.

Public Welfare and Safety

Facilities provided at developed campgrounds and other recreational areas would provide for public welfare and safety. While public land within areas identified as open to motorized vehicle use generally would remain available for such use without restrictions, restrictions could be

imposed when there is a need to promote user safety or protect a resource. To provide for public safety, stipulations would be included in mining plans of operations and timber harvesting. Emergency ORV restrictions would be published in the Federal Register and then proposed as a plan amendment requiring public input. Public hazards would be clearly marked and fenced, if necessary, to prevent injury. Full suppression fire management guidelines would be followed on 253,143 acres.

Past and Present Use of Public and Adjacent Lands

The Proposed Plan provides for the continuation of past and present use of public and adjacent lands while still providing for the protection and development of other resource values.

A decision was made in the Bannock/Oneida EIS to reserve 3,142 acres of unallotted rangeland in Bannock County for wildlife, watershed, and other non-grazing uses. This document modifies that decision and allows leasing of some of those areas while protecting additional acreage not previously covered. The net result is an increase of 987 acres under a no-lease provision.

Range management would provide 29,151 AUMs of livestock forage in the short-term and 34,276 AUMs in the long-term. A total of 598,581 acres would be open for solid minerals (phosphate) leasing. A total of 354,508 acres would be open for oil and gas/geothermal leasing and 329,273 acres would be open for location of mining claims. Approximately 13,255 acres of public forest land would be open to commercial harvest, with an approximate allowable cut of 0.3 million board feet per year. Big game populations of 7,105 deer and 543 elk would utilize 10,521 AUMs of forage.

For riparian, BLM would maintain 70.89 miles of stream in their present satisfactory condition and improve 22.70 miles. Under this multiple-use Plan, 1.40 miles would continue to decline in condition.

This Plan would recognize recreation as the principal use of the lands in two special recreation management areas. Lands open to unrestricted, wheeled vehicle use would total 75,115 acres, while 143,931 acres would be open to over-snow vehicles.

Quantity and Quality of Noncommodity Resource Values

The Proposed Plan provides noncommodity resource values such as wildlife, fisheries, watershed, recreation, wilderness, and cultural sites. The quantity and quality of these resources would best be protected by Alternative D. However, the Proposed Plan would result in big game populations of 7,105 deer and 543 elk. For riparian habitat, BLM would maintain 70.89 miles of stream in their present condition and improve 22.70 miles. Approximately 1.40 miles would continue to decline in condition.

This Plan would recognize recreation as the principal use of the lands in six existing recreation sites, five new sites, and two trail segments totaling six miles. Lands open to unrestricted, wheeled vehicle use would total 75,115 acres and lands open for over-snow vehicles, 143,931 acres.

Environmental Impacts

Transfer of lands out of Federal ownership would result in a loss of administrative control of all resource values except mineral values. Completion of nonstructural range improvements would represent a commitment of land and resources for the duration of the projects. Off-road-vehicle designations of "closed" would continue as in the Existing Situation or Alternative A. The Proposed Plan would add new closed designations for wheeled vehicles by increasing from 320 acres to 3,537 acres and closed to over-snow vehicles by increasing from 22,344 acres to 26,877 acres.

The Proposed Plan would provide for improvement in ecological range condition. Livestock AUMs would show a minor increase over the 5-year average use. Wildlife habitat condition and available AUMs would increase. Riparian habitat would show a moderate improvement. A major increase in recreational opportunities would take place. Impacts to cultural resources would decrease slightly.

Conclusion

Alternative B has been chosen as the Proposed Plan. It gives no special emphasis to any one resource but emphasizes balanced, multiple-use management and is based upon a realistic expectation of funding. The rationale for selection of the Proposed Plan is summarized below.

RATIONALE FOR SELECTION OF PROPOSED PLAN

Minerals Management

The Proposed Plan would maintain 598,581 acres (93 percent) of the PRA open to solid mineral leasing, 354,508 acres (90 percent) available for fluid mineral leasing, 329,273 acres (85 percent) available for locatable mineral entry and 311,793 acres (80 percent) open to mineral materials disposal. A total of 1,934 acres would be closed to mineral exploration on a seasonal basis to protect soils. NSO stipulations would apply to 30,499 acres. A total of 130,000 acres would have seasonal restrictions to protect wildlife. Under the Proposed Plan, 977 acres of proposed RNAs, 2,706 acres of ACECs, and 1800 acres of the Downey PWR would be closed to leasing. A total of 44,378 (7 percent) acres of non-discretionary and discretionary withdrawals would

be closed to solid leasable minerals and 38,895 (10 percent) acres of non-discretionary and discretionary withdrawals would be closed to fluid leasable .

Rationale

Two issues were directed toward minerals management. Issue 10 addressed mineral development and Issue 11 addressed availability of lands for mineral leasing. The Proposed Plan addresses both of these issues. Issue 10 was covered by illustrating the inter-relationship between minerals and other resources. This balanced approach helped define and clarify mineral development areas and subsequently mineral availability (Issue 11) was determined through conflict resolution.

The majority of public lands would be made available for mineral leasing, location, and for mineral materials disposals. Seasonal restrictions would protect other critical resource values and would not significantly impact mineral exploration or development opportunities. Withdrawals from mineral entry would insure the protection of those special or fragile areas while only having a minimal impact on availability.

Lands - Retention and Transfer

A total of 17,068 acres of public land would be evaluated through detailed studies for potential transfer out of public ownership. Of this total, 8,124 acres would be proposed for transfer solely through exchange. A total of 247,413 acres of public land would be retained. BLM would also attempt to acquire 9,687 acres of private land and 9,880 acres of State land primarily through exchange.

Rationale

The Proposed Plan would recognize the expressed need to make lands with community expansion potential available for future development (Issue 1 - Land Tenure). The public lands identified as available for disposal would have little or no multiple use benefits.

The Proposed Plan would maintain continuity in grazing allotments and retain tracts that have high wildlife and multiple use public values. Only parcels of relatively low multiple use value that are difficult and uneconomical to manage or present management problems would be available for transfer.

Access would be a key consideration in all land transfers. Parcels essential to assure public access to BLM administered public lands would be retained.

No public lands within the old Fort Hall Reservation boundary of 1898 area would be offered for disposal through sale. However, opportunities

for exchange may provide benefits to the off-Reservation rights and will be closely coordinated with the Tribes (Issue 9 - Shoshone-Bannock Off-Reservation Rights).

Range Management

The Proposed Plan would retain 247,413 acres of public land for livestock grazing. The stocking rates would be 29,969 AUMs, a 20 percent increase from the current 5 year average use and a 2.8 percent increase from the current active preference . The long-term stocking rate would be 34,276 AUMs, which would be a 12.6 percent increase over the initial stocking rate of 29,969 AUMs. Livestock use adjustments in AUMs or season of use would be based on future monitoring and would be consistent with regulations and policy.

The Proposed Plan recognizes the need for additional brush control. Seedings would be done in areas where a native perennial seed source is not available. Additional range improvements, water facilities and fencing would be provided. To implement this, AMPs/grazing systems would be developed.

Rationale

Livestock grazing on public land is an important economic resource (Issue 3 - Range Management) for this area. The Proposed Plan would maintain most of the current livestock operations with a possibility of increasing use as a result of reducing unallotted acres. The Proposed Plan would also provide for multiple use while allowing grazing, soil protection, wildlife habitat and other resource uses. Range improvements would be designed to enhance or to have few adverse impacts on the other resource uses.

Shoshone-Bannock tribal members have a right to graze their livestock within the old ceded boundary. This right gives the Fort Hall tribal members preference over other members of the private sector (Issue 9 - Shoshone-Bannock Off-Reservation Rights).

Wildlife Management

Under the Proposed Plan, projected populations of 7,105 deer and 543 elk would be supported on winter range on public lands. Approximately 4,131 acres of big game winter/spring range, about 3,215 acres of sage grouse and sharp-tailed grouse seasonal ranges, and about 102 acres of nongame habitat would be improved. This would occur through joint AMP and HMP development by raising ecological range condition from fair to good.

The Stump Creek ACEC would be designated to protect 2,483 acres of important elk winter range.

Rationale

The Proposed Plan recognizes the importance of wildlife habitat on public lands (Issue 4 - Protection of Wildlife Habitat). It would provide for improvement of crucial elk winter habitat, deer, sharp-tailed grouse, sage grouse, and many non-game species habitat. There would be sufficient forage and habitat available to meet the goals of this alternative. Riparian areas would be considered of prime importance and be managed to maintain or improve them where possible. Sensitive and threatened or endangered species habitat would be protected.

Recreation and Visual Resources

Recreation use within the planning area is steadily growing. Principal uses include hunting, fishing, ORV use, river running and sightseeing. The Proposed Plan will designate two Special Recreation Management Areas: The Pocatello ORV use area and Blackfoot River water-based recreation use area. Recreation sites would be developed at 5 additional locations in the planning area.

The Proposed Plan would leave open a total of 75,115 acres to wheeled ORV use and 143,931 acres to over-snow ORV use. Limited designations would be placed on 185,829 acres for wheeled travel and 93,673 acres for over-snow use.

Rationale

The development of the recreation sites would help meet the increasing demand for the recreation resource in the area. The Special Recreation Management Area designations would provide for more detailed planning to accommodate primary uses and reduce conflicts between user.

The closure of areas to ORV use would protect soils from severe erosion and prevent direct conflicts with wildlife. ORV use in the PRA is continuing to grow and the Proposed Plan would protect sensitive resources while allowing ORV use to continue in areas with less potential for resource damage (Issue 6 - Off-Road-Vehicle Use on Public Lands).

Special Designations

The Proposed Plan would result in the designation of three ACECs totaling 4,506 acres and seven RNA/ACECs totaling 1,494 acres.

Rationale

The Stump Creek Ridge ACEC (2,483 acres) is one of the most important elk winter ranges in the PRA. Travertine Park ACEC has three unique features: rare plants, travertine outwash deposits, and a relatively undisturbed mixed-shrub ecosystem. Travertine Park ACEC comprises 223 acres. Downey Watershed ACEC (1800 acres) reserves all water on this land for the community needs of the city of Downey, Idaho.

The seven RNA/ACECs designated in the Proposed Plan are: Cheatbeck Canyon (100 acres), comprised of excellent mixed stands of boxelder and bigtooth maple; Dairy Hollow (45 acres), contains unique geomorphic structures and a good stand of Wyoming sagebrush/needle-and-thread grass habitat as well as Astragalus spatulatus; Formation Cave (70 acres), has pristine stands of bitterbrush, Nevada bluegrass and shrubby cinquefoil; Oneida Narrows (617 acres), has near vertical limestone cliffs containing grottos and caves which provide a haven for a variety of birds and uniquely adapted plants; Pine Gap (232 acres) contains uniform stands of black sagebrush and bluebunch wheatgrass. It also has a rare plant Astragalus spatulatus. Robbers Roost Creek (400 acres) maintains an excellent shrub community common to this part of Idaho. It would provide a very good undisturbed reference and study area. Travertine Park (30 acres) has an undisturbed mixed-shrub community surrounded by rugged geomorphic features.

Cultural Resources

The Proposed Plan would protect and preserve documented prehistoric and historic sites. Activity plans for significant sites would reduce vandalism, and non-permitted artifact removal, while encouraging scientific archaeological research and interpretation.

Rationale

The PRA's cultural resources are fragile and nonrenewable. They have significant archaeological research potential. They also have high educational and visitor use potential. The Proposed Plan recognizes the nature and significance of these resources, and would recommend protective measures or public information facilities.

Forest Management

The Proposed Plan would make 13,255 acres of commercial forest land available for restricted and non-restricted management through clearcut, shelterwood, and select cut harvest regeneration methods.

Approximately 28,011 acres of woodlands would be available for the production of woodland products (firewood, posts and poles, Christmas trees, etc.).

Rationale

The commercial forest lands designated as available for harvest would meet the demand for forest products from the public land. The woodland acres designated as available for harvest would meet the needs of the public by identifying firewood cutting areas and making them accessible. (Issue 7 - Timber and Firewood Utilization).

Riparian and Water Quality

The Proposed Plan would improve water quality, fisheries habitat and riparian habitat on 22.70 miles of stream in the area. Some fencing would be required to provide the protection needed. An additional 70.89 miles of stream would be managed to maintain existing fisheries, water quality and riparian habitat which is currently in satisfactory condition.

Rationale

The Proposed Plan recognizes the water and water related resources in the area are of great importance to the public land and the private land (Issue 8 - Protection of Riparian Habitat and Water Quality).

Steps have been taken in the preferred alternative to improve these resources through management and fencing. Other resource water needs would be taken into consideration in all management actions considered to meet water quality standards.

Soils and Watershed Management

The Proposed Plan would protect 948 acres from erosion at Oneida Narrows and 224 acres of disturbed lands would be reclaimed on Woodall Mountain and Trail Creek. Approximately 360 acres of ashy soils would be protected from any surface disturbance and 500 acres of Juniper would be cut to improve ground cover and reduce erosion potential.

Rationale

Some soils in the PRA are very susceptible to soil erosion. The Proposed Plan would protect areas where severe soil erosion would occur. It would also provide the means to monitor erosion rates and develop procedures to alleviate the problem.

Fire Management

The Proposed Plan would provide full suppression on 96 percent of the PRA. Limited suppression would be implemented on 4 percent of the

area; prescribed fire would be used as a management tool on about one-fourth of the limited suppression area. Fire management plans would be developed which lay out fire prevention and suppression guidelines and fire prescriptions defining under what conditions burning would be allowed.

Rationale

Suppression actions on wildfires will occur on all Pocatello Resource Area lands. Because of the potential threat to life, real property and high resource values at risk, intensive suppression actions will be provided on 96 percent of the Pocatello Resource Area. On the remaining acres (4 percent of the Resource Area), conditional suppression will occur. These wildfires will be managed so that damage to the environmental communities in the area is held to a minimum.

Access

The Proposed Plan would obtain legal public access to 37,300 acres (see Map 8) of public land (17 percent of the PRA).

Rationale

The scattered, isolated nature of some blocks of public land in the PRA provides limited or no public access across private lands. The major need for improved access comes from recreationists (hunting, fishing, ORV users); however, the Forestry and Wildlife programs would also benefit from improved access to public lands. Wherever a need to improve access to public lands across private lands is identified, the impacts to private landowners will have to be carefully considered (Issue 2 - Legal and Physical Access to Public Lands).

Planning Criteria

Planning criteria are the factors or data that BLM must consider prior to arriving at a land use decision relative to any issue. The following are the factors that have been used in arriving at decisions in the Draft RMP:

- A. Social and economic values.
- B. Plans, programs, and policies of other Federal agencies, State and local governments, and Indian tribes.
- C. Existing law, regulations, and BLM policy.
- D. Future needs and demand for existing or potential resource commodities and values.
- E. Public input.
- F. Public welfare and safety.
- G. Past and present use of public and adjacent lands.
- H.. Quantity and quality of noncommodity resource values.
- I. Environmental impacts.

Other criteria directly related to issues addressed in this RMP are:

1. Public land disposal involving either public sale or exchanges must meet the criteria in Section 203 or 206 of FLPMA.
2. Acquiring legal access to blocks of public lands where the public and BLM have identified high resource values must meet the criteria of Section 205 of FLPMA, which states: Acquisitions shall be consistent with the mission of the department involved, and with land use plans.

The level (type) of access needed will be determined by activity planning, legal adequacy, costs vs benefits, duration, availability of informal use authorizations, and assurance of favorable opinion of title.

3. The following factors being considered in setting livestock use levels and establishing basic management:
 - a. The economic stability of the local livestock industry in all seven counties.
 - b. Plant vigor maintenance requirements, condition and trend, as well as watershed and riparian area protection and stability requirements, must be met.
 - c. The BLM will provide habitat, including forage, for wildlife on public land. The amount of forage provided is determined by BLM through consultation with the Idaho Department of Fish and Game and the public land users.
4. BLM will manage fish and wildlife habitat on the public lands by:
 - a. Preparing Habitat Management Plans.
 - b. Installing wildlife improvements: fences, watering facilities, brush seedings, and goose nesting platforms.
 - c. Giving priority to threatened or endangered species habitat.
 - d. Maintaining big game habitat to support herd numbers as identified by the Idaho Department of Fish and Game.
 - e. Inclusion of stipulations or conditions on BLM leases.
5. Control of grasshoppers on public lands is also a concern in the BLM. We will continue to cooperate with APHIS wherever grasshopper population densities occur. Whenever grasshopper or mormon cricket population exceed 8 per square yard on BLM lands next to croplands, control can be started. Infestation on "large blocks" of BLM rangeland can also be controlled under this Act.

Control of noxious weeds is a concern to BLM. In the PRA, Dyer's woad is the most widespread weed which has infested approximately 1,620 acres of public land. The BLM is presently cooperating in a Noxious Weed EIS supplement which was completed in early 1987. Individual sites and species will be handled on a case-by-case basis in accordance with the EIS supplement.

6. Public lands will be designated as either open, limited, or closed to motorized vehicles. In making these determinations, BLM will consider the following:
 - a. Public safety.
 - b. Resolving conflicts between uses of public lands.
 - c. Resource protection requirements.
 - d. Public access requirements for recreation use.
 - e. Maintaining the Pocatello ORV Plan's designations.
7. Generally, lands containing commercial timber or other forest products such as firewood, posts and poles, and Christmas trees are available for harvest except where expressly closed by law or regulation. Some areas may also be subject to special restrictions to protect other resource values. All Timber Production Capability Classifications will be re-evaluated relative to current BLM forest land policy.
8. Executive Order (E.O.) 11990 requires BLM to avoid long-term and short-term adverse impacts associated with destruction, loss, or degradation of wetland-riparian areas. BLM must also ensure the preservation and enhancement of "the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage". A variety of methods may be employed, including the use of management actions designed to maintain or improve riparian habitat, inclusions of stipulations or conditions in BLM leases, granting of licenses and permits, and development of detailed plans for watershed management.

BLM policy and responsibilities mandate adherence to FLPMA and the Clean Water Act in regards to nonpoint-source water quality management (refer to Section 208, Public Law 92-500). By the use of standard operating procedures and best management practices, the BLM will meet or exceed Idaho State water quality standards. Monitoring will be conducted to check compliance and effectiveness of these practices and procedures.

9. The BLM will accommodate on public lands within the ceded boundary all Shoshone-Bannock Tribes' off-Reservation rights with as little impact as possible to existing privileges granted through lease or permit.

No public lands within the ceded area will be disposed of through sale. However, opportunities for exchange may provide benefits to the off-Reservation rights and the BLM will be closely coordinated with the Tribes.

10. BLM manages energy and mineral resources on the public lands. Generally, the public lands are available for exploration and development, subject to applicable regulations and Federal and State laws.

Areas will be identified where there are major conflicts between mineral leasing and exploration and other resources. Generally, when these conflicts occur, an Environmental Assessment will be completed to develop measures which would be tailored to the specific conditions and resources affected. These stipulations will be designed to eliminate or reduce adverse impacts to the resources in conflict with mineral leasing.

Where adverse impacts to critical resources cannot be adequately mitigated, leasing will be allowed only with a No-Surface-Occupancy (NSO) stipulation.

11. BLM policy states that it is the objective of BLM to make public lands available for the orderly and efficient development of energy and mineral resources under principles of balanced multiple use management. This policy also states that withdrawals and administrative actions must be clearly justified and be in the national interest (BLM Mineral Resources Policy Statement, 1984).

Lands and mineral estate with high values will continue to be made available for exploration and leasing under all alternatives. NSO stipulations will only be applied using sound management criteria and where resource protection is required by the FLPMA.

STANDARD OPERATING PROCEDURES

The following management guidance applies to, and is a part of, the Proposed Management Prescription as well as all alternatives considered in detail in Part II. All standard operating procedures are based on existing laws, regulations, and policy.

Allowable Uses

The public lands will be managed under the principles of multiple use and sustained yield as required by the FLPMA. Any valid use, occupancy, or development of the public lands that conforms with the RMP will be considered. Those uses, including rights-of-way, leases, and permits, will be subject to environmental review and may require limitations or stipulations to protect and preserve natural resources. Limitations may also be imposed on either the type or intensity of use, or both, because of environmental values, hazards, or special management considerations. Some limitations have already been identified for specific areas. These are included in the land use allocations and management objectives in this RMP.

Coordination With Other Agencies, State and Local Governments, and Indian Tribes

BLM will ensure that the detailed management plans and individual projects resulting from the RMP are consistent with officially adopted and approved plans, policies, and programs of other agencies, State and local governments, and Indian Tribes. Cooperative agreements and Memoranda of Understanding will be developed as needed.

Air Quality

Under the Clean Air Act (as amended, 1977), public lands were given a Class II air quality classification, which allows moderate deterioration associated with moderate, well-controlled industrial and population growth. BLM will manage all public lands as Class II unless they are reclassified by the State as a result of the procedures prescribed in the Clean Air Act (as amended, 1977). Administrative actions on the public lands will comply with the air quality classification for that specific area.

Two cities in the PRA were classified nonattainment: Soda Springs and Pocatello. As a result, the BLM will consult Rules and Regulations for the Control of Air Pollution in Idaho (1985) before conducting activities (such as prescribed burning) which would increase the amount of particulate matter.

Lands

Land Ownership Adjustments

Objectives for acquiring public lands are discussed under activity needs within the alternatives. Site-specific decisions regarding land ownership adjustments in the PRA will be made based on whether the lands are needed for BLM programs or are considered more valuable for other purposes. The following criteria will be applied to site-specific determinations for lands that are within transfer areas:

1. Public resource values to be considered include but are not limited to:
 - a. Threatened, endangered, or sensitive species habitat.
 - b. Riparian areas.
 - c. Fisheries.
 - d. Nesting/breeding habitat for game animals.
 - e. Key big game seasonal habitat.
 - f. Developed recreation and recreation access sites.
 - g. Class I scenery.
 - h. Municipal watersheds.
 - i. Energy and mineral potential.
 - j. Sites or places eligible for inclusion on the National Register of Historic Places.
 - k. Other designations authorized by law.
2. Accessibility of the land for public uses.
3. Amount of public investment in facilities or improvements and the potential for recovering that investment.
4. Difficulty and cost of administration (manageability).
5. Suitability of the land for management by another Federal agency.
6. Significance of the decision in stabilizing business, social, and economic conditions and/or lifestyles.

Retention Areas

Public land will be retained in public ownership and be managed by the BLM. Where unforeseen needs are identified, land disposals will be considered through plan amendments.

Transfer Areas

Public land within transfer areas generally will be made available for disposal through sales, exchanges, or Recreation & Public Purposes Act. Some land may be retained in public ownership when public values dictate .

All land exchanges or land disposals involving riparian habitat, wetlands, and floodplains will be conducted in accordance with E.O. 11988 and E.O. 11990. Also, BLM policy in realty action will:

1. Avoid long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas.
2. Avoiding construction in wetland-riparian areas whenever there is a practical alternative.
3. Preserve and enhance the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage.
4. Include practical measures to minimize harm in all actions causing adverse impacts to wetland-riparian areas.
5. Retain under BLM administration and ownership all wetlands and riparian habitats except:
 - a. If Federal, State, public and private institutions, and parties have demonstrated the ability to maintain, restore, and protect wetlands and riparian habitats on a continuous basis.
 - b. If transfer of public lands, minerals, and subsurface estates is mandated by legislation or Presidential order.

Exchanges

Land to be acquired by BLM through exchanges generally should be located in the retention areas. In addition, acquisition of such land should:

1. Facilitate access to public lands and resources.
2. Maintain or enhance important public values and uses.
3. Maintain or enhance local social and economic values.
4. Improve management efficiency through the elimination of isolated tracts and the blocking up of public lands.
5. Facilitate implementation of other aspects of the Pocatello RMP.

Land for Local Government and Community Expansion

In the past, sanitary landfill sites have been authorized under the Recreation and Public Purposes Act (R&PP). BLM will no longer lease or patent land for landfill purposes under this Act because of the liability and enforcement problems associated with hazardous waste disposals.

Sales

Public land to be sold must meet one or more of the following criteria derived from Section 203(a) of the FLPMA:

1. The land must be difficult and uneconomical to manage as part of the public lands and must not be suitable for management by another Federal department or agency.
2. The land must have been acquired for a specific purpose and must no longer be required for that or any other Federal purpose.

3. Disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership, and these objectives outweigh other public objectives and values that would be served by maintaining the land in Federal ownership.

Sale will be the preferred method of disposal when:

1. It is required by national policy.
2. The level of interest in a specific tract indicates that competitive bidding is desirable for reasons of fairness.

Unauthorized Use

It is BLM policy to identify, abate, and prevent unauthorized use of public lands.

Utility/Rights-of-Way

Utility and transportation development may be permitted based on consideration of the following criteria:

1. Type of and need for the proposed facility.
2. Conflicts with other existing or potential resource values and uses.
3. Availability of alternatives and/or mitigation measures.

Land Use Authorizations

Land use permits under Section 302 of the FLPMA may be used as an interim management measure for resolving unauthorized use problems prior to a final land use/status determination, and for one-time uses of short duration. Leases will be used as a longer term (5 to 10 years) interim management tool, particularly where future disposal or dedication to another particular land use is contemplated. The latter may allow for agricultural use on an area that may also be needed for future communication sites, as a materials source, or for community expansion needs.

Cooperative agreements, under certain circumstances, may be reached with other Federal entities for uses that are not appropriately covered by a right-of-way or a withdrawal. Flood control and aquifer recharge areas may be most appropriately covered by cooperative agreements.

Withdrawals and Classifications

In accordance with FLPMA, BLM is required to review all withdrawals on and classifications of public lands by October 20, 1991. This includes a

review of approximately 53,865 acres of various withdrawals. The review of all public lands under the Classification and Multiple Use Act (C&MU) which terminates 197,200 acres of public land, was completed November 9, 1982. The C&MU termination is pending and is subject to the final outcome of the National Wildlife Federation lawsuit (Civil Action #85-2238).

Access

All existing public access routes will be reserved if the lands are transferred out of public ownership.

Access Acquisition

Before the initiation of the acquisition activity, either access needs will be identified or a determination will be made that no access rights need be acquired in the planning process. This decision-making process occurs only after a full inventory and analysis of public lands and resource management needs have been completed and approved. BLM will acquire all interests in the name of the "United States of America and its assigns," and to acquire only those interests needed to adequately protect the United States' investments. The BLM will not take the initiative and acquire property in fee when an easement or other suitable alternative is available. BLM personnel must adhere to the applicable provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 CFR Secs. 4601 et seq.) and the Department's Federal Property Management Regulations (41 CFR Part 114-50) reprinted as "400 DM Additions to FPMR". Acquisition of access rights will support one or more of these resources: lands, minerals, forestry, range, wildlife, recreation, and watershed.

Generally, the BLM will acquire exclusive easements. This type of easement conveys to the United States full control of the easement right-of-way for the purposes stated in the document. It may provide legal access to public lands for the United States, its permittees, licensees, and the general public. It may enable the BLM to regulate use of the road through issuance of right-of-way permits or licenses. BLM can spend the necessary funds to construct, reconstruct, improve, and maintain facilities on the easement area which are commensurate with its management objectives. These easements generally are perpetual. Exclusive easements should be acquired when one or more of the following conditions exist:

1. Access by the general public to public lands is needed.
2. Substantial investment in construction, improvement, and/or maintenance of physical improvements on the acquired property is planned.

3. Existing cooperative road agreements require that BLM acquire adequate rights for other parties.
4. Where applicable in the case of the logging road permits issued or assigned after May 4, 1956, the BLM may obtain perpetual easements under the terms of 43 CFR 2812.6-2(a)(11) for construction of roads with appropriated funds.

Energy and Minerals

The following leasable minerals procedures describe BLM's leasable mineral management responsibilities on all Federal lands. These responsibilities include the Federal mineral estate under National Forest System lands. The locatable and salable procedures are limited to BLM administered lands and minerals.

These Forest Service administered acres are shown in Tables 5 and 6. Forest Service acreage data will only be included in this section of this RMP and will not be carried through the Alternatives Analysis in the EIS. If more information is desired, please refer to the Caribou National Forest Land and Resource Management Plan.

TABLE 5
NON-ENERGY SOLID LEASABLE MINERALS
WITHIN NATIONAL FOREST SYSTEM LANDS WITHIN PRA

<u>Area Open</u>	<u>Acres</u>
Low Potential	128,990
High Potential	38,150
No Potential	<u>751,139</u>
Subtotal	918,279
<u>Area Closed</u>	
Low Potential	1/ 9,292
High Potential	2/ 140
No Potential	<u>37,034</u>
Subtotal 3/	46,466
TOTAL	964,745

- 1/ Admin. Sites (604 acres), Recommend No Prospecting Permits (8688 acres)
 2/ Johnson Creek Admin. Site
 3/ WSA (30,600 acres), Admin. Sites (7178 acres), Recommend No Prospecting Permit (8688 acres)

TABLE 6
 FLUID LEASABLE MINERALS
 WITHIN NATIONAL FOREST SYSTEM LANDS WITHIN PRA

<u>Area Open</u>	<u>Acres</u>
Low Potential	204,069
Moderate Potential	49,012
High Potential	673,886
Subtotal	926,967
<u>Area Closed</u>	
Low Potential	2,010
Moderate Potential	556
High Potential	35,212
Subtotal	37,778
TOTAL	964,745

Within the PRA boundaries, the Caribou National Forest contains 964,745 acres of Federal mineral estate, 95.2 percent of which is considered open for solid mineral leasing and 96.1 percent of which is considered open for fluid mineral leasing.

Within the National Forest, the following categories of lands are considered closed to solid mineral leasing: Forest Service Administrative Sites, RARE II Roadless Areas, and other lands considered but not recommended for Phosphate Prospecting Permit issuance (covered in a 1983 USFS Environmental Assessment). For fluid mineral leasing the Rare II roadless area and Administrative sites are closed to leasing.

BLM also has mineral management responsibility on the Fort Hall Reservation. Standard operating procedures are based on the 1984 Memorandum of Understanding for Mineral Exploration, Leasing and Development between BLM and Bureau of Indian Affairs.

Solid Leasable Minerals - Phosphate

The PRA processes Phosphate Prospecting Permit Applications on lands where BLM is the surface management agency. The 43 CFR 3500 regulations require that the prospecting permit and associated exploration plan be combined into one permit action.

If a valuable deposit of phosphate is discovered, an application for Preference Right Lease is applied for and must also include a description of the proposed mining methods.

Mining/Reclamation plans are required prior to mining on a Federal Lease. The mine plans are reviewed for technical adequacy, maximization of resource recovery, safety, and environmental impacts. An environmental document is written and special stipulations to mitigate impacts are included in the mine plan approval.

Fluid Leasable Minerals - Oil & Gas and Geothermal

Oil and gas lease offers are reviewed in the PRA prior to being placed on the BLM's simultaneous leasing system. Standard and special lease stipulations are included in the individual leases (See Appendix G) to protect other surface resource values.

The PRA processes several Notices of Intent (NOIs) to conduct geophysical work each year. Special stipulations are attached to the NOI covering various restrictions due to water, soil, wildlife, and cultural resources. Shot-hole drilling is regulated by both BLM and the State of Idaho.

Oil and Gas operations requirements are outlined in BLM Onshore Operations Order No. 1, and BLM Manual Handbooks. Stipulations developed from the Environmental Assessment become conditions of approval in the Application to Drill (APD). Inspections are conducted to assure the conditions in the ADP are being complied with.

At this time there are no geothermal leases or lease applications in the PRA. Any new permits for exploration and drilling would be handled very much the same way as in oil and gas.

Locatable Minerals

Mining claims and the mining of locatable minerals are regulated by the 1872 mining law, as amended, and the 43 CFR 3802 and 3809 Surface Management Regulations.

BLM requires the claimant to submit a Notice or a Plan of Operations whenever surface disturbing activities produced by the use of mechanized equipment are proposed. The State of Idaho also has enacted laws that regulate such activities (Idaho Code Title 47 Chapters 13 and 15).

Salable Minerals

Sales and free use permits are processed according to 43 CFR 3600 regulations and BLM Manual handbooks. Mining and reclamation plans and/or special site management stipulations are developed for each site of mineral materials removed. Permittees are required to reclaim exclusive use sites as specified in permit stipulations. Sales from community pits and common use areas include fees for the eventual reclamation by BLM of lands affected.

Forest Management

1. Merchantable timber or tracts identified as intensive management areas are to be systematically harvested using appropriate methods.
2. Salvage operations will have priority when trees are destroyed by fire, disease, insects, or other forest pests.

3. All non-stocked intensive management areas due to timber harvest, insects, disease, or fire should be regenerated naturally. Underplanting planting to acceptable species shall be considered when natural regeneration does not occur within five years.
4. Other guidelines for forest management activities that will be incorporated as operating procedures can be found in the Eastern Idaho Sustained Yield Unit, Timber Management Final Environmental Analysis Record.

Range

Allotment Categorization

All grazing allotments and unallotted tracts in the PRA have been assigned to one of three management categories: "M" (maintain), "I" (improve), and "C" (custodial). They have been assigned based on present resource conditions, potential for improvement, and management objectives. The "M" category allotments generally will be managed to maintain current satisfactory resource conditions; "I" category allotments generally will be managed to improve resource conditions; and "C" category allotments will receive custodial management while protecting existing resource values.

Allotment-specific Objectives for the Improvement Category

Multiple use management objectives have been developed for each allotment in the "I" category. Future management actions, including approval of allotment management plans, will be tailored to meet these objectives. Monitoring will also be used to measure the changes brought about by new livestock management practices and to evaluate the effectiveness of management changes in meeting stated objectives. Detailed guidance for rangeland monitoring is available in current BLM policy and guidance.

The Federal regulations that govern changes in allocation of livestock specify that permanent increases in livestock forage or suspensions of preference "shall be implemented over a five-year period...." The regulations do provide for adjustments to be implemented in less than five years when an agreement is reached to implement the adjustment in less than five years or a shorter implementation period is needed to sustain resource productivity.

Temporary Suspensions and Closures

Temporary suspensions of grazing use or closures of all or portions of allotments may be implemented to protect the public lands because of drought, fire, flood, or insect infestation. When conditions such as fire, flood, or insect infestation create a significant impact on the normal operation of a grazing operator, efforts to mitigate the impact

will be taken by BLM. These mitigating efforts may consist of relocation of grazing use, modification of grazing systems, and granting of temporary nonrenewable grazing use in other allotments under permit or lease. No action will be taken by BLM prior to consultation and coordination with affected permittees or lessees and other affected parties.

Range Improvements and Treatments

Typical range improvements and treatments and the general procedures to be followed in implementing them are described in Appendix A of the draft document. The extent, location, and timing of such actions will be based on the allotment-specific management objectives adopted through the resource management planning process, interdisciplinary development and review (to include the Idaho Department of Fish and Game) of proposed actions, operator contributions, and BLM funding capability. (Since some of the soils in the PRA may be unsuitable for range improvement projects, proposed projects will be investigated for feasibility prior to approving location and design plans.)

All allotments in which range improvement funds are to be spent will be subjected to an economic analysis. The analysis will be used to develop a final priority ranking of allotments for spending range improvement funds that are needed to carry out activity plans. The highest priority for implementation generally will be assigned to those improvements for which the total anticipated benefits exceed costs. Generally, all structural range improvements will be maintained by the benefiting party(s). All nonstructural range improvements will be maintained by BLM.

Noxious weed and grasshopper control will be considered under all alternatives. Individual sites and species (i.e., Canada thistle, musk thistle, Dyers woad, leafy spurge, etc.) will be handled on a case-by-case basis through the environmental assessment process. Where biological controls have proven to be effective, they will be used in preference to chemical or mechanical methods.

Grazing Systems

The type of system to be implemented will be based on consideration of the following factors:

1. Allotment-specific management objectives (see Appendix A in the Draft document).
2. Resource characteristics, including vegetation potential and water availability.
3. Operator needs.
4. Implementation costs.

Unallotted Tracts

Unallotted tracts generally will remain available for further consideration for authorized grazing, as provided for in the current BLM grazing regulations. However, certain tracts currently closed or restricted to grazing use will remain so.

Wildlife and Fisheries Program

General

Fish and wildlife habitat will continue to be evaluated on a case-by-case basis as a part of project planning. Such evaluation will consider the significance of the proposed project and the sensitivity of fish and wildlife habitat in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with management objectives for fish and wildlife habitat. Habitat improvement projects will be implemented where necessary to stabilize or improve unsatisfactory or declining wildlife habitat condition. Such projects will be identified through habitat management plans or multiple resource management activity plans.

Seasonal Restrictions

Seasonal restrictions will continue to be applied where they are needed to mitigate the impacts of human activities (except for leasable minerals exploration and development) on important seasonal wildlife habitat. The major types of seasonal wildlife habitat and the time periods in which restrictions may be needed are shown in Table 6. Approximately 39 percent (103,232 acres) of the PRA lies within areas potentially subject to restriction. During any given year, the authorized officer may waive or adjust seasonal wildlife restrictions if actual conditions warrant.

TABLE 7
SEASONAL WILDLIFE RESTRICTIONS

<u>Habitat</u>	<u>Restricted Period</u>
Big Game Winter Range	11/15-04/30
Elk Calving Areas	04/30-06/30
Raptor Nest Sites	Dates vary by species
Sage Grouse/Sharp-tailed Grouse Strutting Grounds	03/01-04/30
Sage Grouse/Sharp-tailed Grouse Nesting and Broodrearing	04/30-06/30
Endangered Species	No-Surface-Occupancy, size is site specific.
Riparian areas, live water	No closer than 500 feet year round

Threatened, Endangered, and Sensitive Species Habitat

Whenever possible, management activities in habitat for threatened, endangered, or sensitive species will be designed to benefit those species through habitat improvement. For instance, the sensitive plant, Astragalus spatulatus (spoon-leaf milkvetch), is found in two proposed RNA/ACECs. Two others, Astragalus jejunus (milkvetch) found in the same general area and Salicornia rubra (red glasswort) found in salt seeps in Caribou County, do not have special protection proposed at this time. However, a monitoring plan for each species will be initiated to determine their population trends. If it is determined that they need protection, then that protection will be provided.

The same concern will be shown for all sensitive species found in the PRA.

The Idaho Department of Fish and Game and the U.S. Fish and Wildlife Service will be consulted prior to implementing projects that may affect habitat for threatened and endangered species. If a "may affect" situation is determined through the BLM biological assessment process, consultation with the U.S. Fish and Wildlife Service will be initiated in accordance with Section 7 of the Endangered Species Act of 1973, as amended.

Terrestrial Wildlife Habitat

Sufficient forage and cover will be provided for wildlife on seasonal habitat. Forage and cover requirements will be incorporated into allotment management plans and will apply to specific areas of primary wildlife use.

Range improvements generally will be designed to achieve both wildlife and range objectives. Existing fences will be modified and new fences will be built so as to allow wildlife passage. Water developments generally will not be established for livestock where significant conflicts with wildlife for vegetation or water would result.

Vegetation manipulation projects will be designed to minimize impact on wildlife habitat and to improve it whenever possible. These projects will comply with sage grouse, elk, and mule deer management guidelines. The Idaho Department of Fish and Game will be consulted one year in advance on all vegetation manipulation projects. Animal control programs will be coordinated with the U.S. Department of Agriculture.

Riparian habitat needs will be taken into consideration in developing livestock grazing systems and pasture designs. Some of the techniques that can be used to lessen impacts are:

1. Constructing shade structures in conjunction with water development areas from riparian areas.

2. Using prescribed fire to improve vegetation which will draw cattle away from riparian zones.
3. Changing class of stock from cow/calf pairs to herded sheep or yearlings.
4. Eliminating hot season grazing or scheduling hot season grazing for only one year out of every three.
5. Locating salt away from riparian zones.
6. Locating fences so that they do not confine or concentrate livestock near the riparian zone.
7. Developing alternative sources of water to lessen the grazing pressure on the riparian habitat.
8. Using temporary electric fencing.
9. Excluding livestock completely from riparian habitat by using protective fencing, if fencing is determined to be the only solution to the conflict.

Forestry Activities

Where applicable, the elk management guidelines contained in Elk Habitat Relations for Central Idaho (Ralphs 1981) will be followed. These include:

1. Managing public vehicle access to maintain the habitat effectiveness of security cover and key seasonal habitat (such as winter range and calving/nursery areas) for deer and elk.
2. Maintaining adequate untreated peripheral zones around important moist sites, e.g., wet sedge meadows, springs, and riparian zones.
3. Ensuring that slash depth inside clear cuts does not exceed 1 1/2 feet.
4. Generally discouraging thinning immediately adjacent to clear cuts.

Fencing

To the extent possible, fences will be located and constructed to maximize their visibility to animals, to take advantage of flat areas (benches, saddles, etc.).

Existing fences posing a potential or known problem to big game movement will be modified.

Water Development

1. Free water for use by wildlife shall be maintained at or within 1/4 mile of all spring developments. This water shall remain available for at least as long a period as predevelopment conditions provided.
2. Adequate water shall remain at spring developments to maintain any associated riparian zone.
3. Height of troughs or other water containers shall not exceed 20 inches above ground level.
4. Bird ladders or other appropriate wildlife escape devices will be installed and maintained in all water troughs.
5. Pipelines and troughs should remain charged with water from June 1 to October 31 to provide for wildlife that has become dependent upon them. Maintenance of these projects will be negotiated between BLM, Idaho Department of Fish and Game, and the permittee.

Vegetation Manipulation

1. The Idaho Department of Fish and Game shall be given at least a one year notice prior to any vegetation manipulation project.
2. Brush control projects will be designed to maximize edge effect to the extent possible. Islands of untreated vegetation will be incorporated into project design as necessary to provide cover for wildlife.
3. Proposed brush manipulation projects on deer and elk winter range must have a predicted neutral or beneficial effect on these species.
 - a. The sagebrush canopy cover will not be reduced below 10 percent on sage grouse broodrearing areas.
 - b. The sagebrush canopy cover will not be reduced below 20 percent on sage grouse nesting and wintering areas.
4. Brush control proposals within 2 miles of known strutting grounds will be subject to on-site inspection by BLM and Idaho Department of Fish and Game personnel to determine prohibited areas.
5. As a rule, no brush control will be allowed within 100 yards of streams, meadows, or secondary drainages (dry and intermittent). The desirability of increasing or decreasing the width on specific areas will be determined via on-site evaluation by BLM and Idaho Department of Fish and Game personnel.
6. A mixture of grasses, forbs, and shrubs should be used in all range rehabilitation or improvement projects.

Soil and Watershed Management

General

Soil and water resources will continue to be evaluated on a case-by-case basis as a part of project planning. Such an evaluation will consider the significance of the proposed projects and the sensitivity of the resources. Stipulations will be attached as appropriate to prevent adverse impacts to soil and water.

Soils

Adequate cover will be maintained to keep soil erosion within tolerable limits. Recent research suggests the soil loss tolerance figure for rangeland in this area is 5.0 tons per acre per year.

Water

Water quality will be maintained or improved in accordance with State and Federal standards. State agencies will be consulted on proposed projects that may significantly affect water quality. Management actions on public land within municipal watersheds will be designed to protect water quality and quantity.

All BLM initiated or authorized programs and actions potentially affecting wetland-riparian areas will comply with the spirit and intent of E.O. 11990 (Wetlands Act) and BLM policy as put forth in BLM Manual Section 6740.06. These directives stress the avoidance of (1) "...long and short-term adverse impacts associated with the destruction, loss, or degradation of wetland-riparian areas" and (2) the preservation and enhancement of "the natural and beneficial values of wetland-riparian areas which may include constraining or excluding those uses that cause significant, long-term ecological damage."

Roads and utility corridors will avoid riparian zones to the extent practicable. Bridges and culverts will be designed and installed to maintain adequate fish passage.

Recreation

Recreation Opportunities

A broad range of outdoor recreation opportunities will continue to be provided for all segments of the public, depending on demand. Trails and other means of public access will continue to be maintained and developed where necessary to enhance recreation opportunities and allow public use. Developed recreation facilities receiving the heaviest use will receive first priority for operation and maintenance funds. Sites that cannot be maintained to acceptable health and safety standards will be closed until deficiencies are corrected. Investment of public funds for new recreation developments will be only on land identified to remain in public ownership.

Recreation resources will continue to be evaluated on a case-by-case basis as a part of project planning. Such evaluation will consider the significance of the proposed project and the sensitivity of recreation resources in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with recreation management objectives.

Motorized Vehicle Use

Travel planning, including the designation of areas open, limited, and closed to motorized vehicle access, will remain a high priority for public land. Public land within areas identified as open to motorized vehicle use generally will remain available for such use without restrictions. Exceptions to this general rule may be authorized after consideration of the following criteria:

1. The need to minimize damage to soil, watershed, vegetation, or other resource values.
2. The need to minimize harassment of wildlife or significant degradation of wildlife habitats.
3. The need to promote user safety.
4. The need to provide use enjoyment and minimize use conflicts.

Public land within areas currently having motorized vehicle use restrictions generally will receive priority attention during travel planning. Specific roads, trails, or portions of such areas may be closed seasonally or yearlong to all or specified types of motorized vehicle use.

Public land within areas closed to motorized vehicle use will be closed yearlong to all forms of motorized vehicle use except emergency or authorized vehicles.

Restrictions and closures will be established for specific roads, trails, or areas only where problems have been identified. Areas not designated as limited or closed will remain open for motorized vehicle use except in an emergency: fire, flood, etc.

Visual Resources

Visual resources will continue to be evaluated as a part of activity and project planning. Such evaluation will consider the significance of the proposed project and the visual sensitivity of the affected area. Stipulations will be attached as appropriate to maintain designated Visual Resource Management Classes.

Wilderness Resources

The Petticoat Peak and Worm Creek WSAs will continue to be managed in compliance with BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (BLM revised June 1986) until acted upon by Congress.

Public land within areas added by Congress to the National Wilderness Preservation System will be managed according to the BLM's Wilderness Management Policy and the 1964 Wilderness Act. Site-specific wilderness management plans would be developed for areas after designation by Congress.

Fire Management

Fire Control

Current BLM policy is to suppress all fires on or threatening protected lands with sufficient forces to contain the fire during the first burning period. The Area Manager will be contacted by Idaho Falls dispatch within thirty minutes of the discovery of any fire occurring in the PRA. The Area Manager will then determine if a resource advisor should be assigned to the fire.

In areas where controlling fires is extremely difficult or where the values threatened do not warrant the expense associated with the usual suppression procedures, managers may prepare advance plans for limited suppression actions for approval of the State Director.

Until fire management plans are developed in proposed WSAs, the BLM will continue all presuppression, suppression, and post-suppression fire activities under current methods of operation, using caution to avoid unnecessary impairment of an area's suitability for preservation as wilderness, ACEC, RNA, and recreation area.

Fire Management

In areas where the use of fire as a resource tool is proposed, a prescribed fire plan will be prepared in advance of natural or intentional ignition.

Fire Rehabilitation

Burned areas will be evaluated and analyzed to determine rehabilitation needs. Corrective measures to prevent erosion and restore resource uses.

Cultural Resources

BLM is required to identify, evaluate, and protect cultural resources on public lands under its jurisdiction and to ensure that BLM initiated or

BLM authorized actions do not inadvertently harm or destroy non-Federal cultural resources. These requirements are mandated by the Antiquities Act of 1906, the Reservoir Salvage Act of 1960 as amended by P.L. 933-191, the National Historic Preservation Act of 1966 and amendments, the National Environmental Policy Act of 1969, E.O. 11593 (1971), Section 202 of the FLPMA, and the Archeological Resources Protection Act of 1979, together with 36 CFR 800.

Prior to starting any BLM initiated or authorized action that involves surface disturbing activities, sale, or transfer from Federal management, a Class III inventory as specified in BLM Manual Section 8111.4 will be conducted. If properties that may be eligible for the National Register are discovered, BLM will consult with the State Historic Preservation Officer and forward the documentation to the Keeper of the National Register to obtain a determination of eligibility in accordance with 36 CFR Part 63.

Cultural resource values discovered in a proposed project or authorized action area will be protected by adhering to the following methods:

1. Avoidance. Cultural resources would be protected by redesigning or relocating the project or excluding significant cultural resource areas from development, use, or disposal.
2. Salvaging. If a project cannot be redesigned or relocated, cultural resource values will be salvaged through controlled, scientific methods pursuant to the State Historic Preservation Office agreement.
3. Project/Action Abandonment. If the site is determined to be of significant value or the above-mentioned methods are not considered adequate, the project will be abandoned.

All cultural sites identified as cultural resource management areas will be closed to ORV use, vegetation manipulation, and surface occupancy.

All cultural sites known to be eligible for National Register nomination or listed on the National Register will be protected from deterioration and be retained in Federal ownership.

Documented cemeteries and burial areas will be closed to livestock grazing. Cemeteries and burial areas will be withdrawn from mineral entry. NSO will be stipulated for documented cemeteries and burial areas.

Paleontological Resources

Various laws require the identification, evaluation, and protection of paleontological resources on public lands. Those laws include the Antiquities Act of 1906, the Petrified Wood Act of 1962, the National Environmental Policy Act of 1969, the Historical and Archaeological Data

Preservation Act of 1974, the Federal Coal Leasing Amendments Act of 1976, the Federal Land Policy and Management Act of 1976, and the Surface Mining Control and Reclamation Act of 1977. The management of paleontological resources of significant scientific interest is governed by these laws. Such resources include invertebrate or paleobotanical fossils considered objects of scientific interest by a qualified paleontologist. All vertebrate fossils are considered to be objects of significant scientific value.

The disposal of fossils considered to be scientifically significant may be allowed, but only if the fossils are removed for scientific purposes. Fossils that are not of scientific interest may be collected in small amounts for personal, non-commercial purposes without a permit. The removal of large quantities for commercial purposes requires a permit.

When paleontological resources of scientific value are discovered during authorized land use operations, these values will be protected through salvage or avoidance. Project termination may be mandatory in some cases.

Operations that have the potential of damaging paleontological resources of significant scientific interest are allowed only under the following conditions:

1. Operators shall not knowingly disturb, alter, injure, or destroy any scientifically important paleontological remains on Federal lands.
2. Operators shall immediately bring to the attention of the authorized officer any paleontological resources that might be altered or destroyed on Federal lands by his/her operations, and shall leave such discovery intact until told to proceed by the authorized officer. The authorized officer shall evaluate the discoveries brought to his/her attention and take action to protect or remove the resource.

Because fossil remains of shark and fish occur beneath the lowest ore zone of the Phosphoria Formation, phosphate exploration and mining operations usually do not disturb them. The two conditions listed above are not stipulated in phosphate prospecting permits or leases, but "notices to operators" are issued to ensure that the authorized officer is notified if/when such fossil deposits are encountered. Any evaluation or collection of material is conducted in a manner that would not significantly interfere with phosphate operations.

As previously noted, all vertebrate fossils are considered to be objects of significant scientific value and will be protected as required by law. However, the scientific significance of invertebrate and paleobotanical fossils within the PRA is undetermined at this time. Appropriate protection of fossil flora and invertebrate fauna will be provided on a case-by-case basis.

Cadastral Survey

Cadastral surveys will continue to be conducted in support of resource management programs. Survey requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Road and Trail Construction and Maintenance

Road and trail construction and maintenance will continue to be conducted in support of resource management objectives. Construction and maintenance requirements and priorities will be determined on a yearly basis as a part of the annual work planning process.

Investment of public funds for road and trail construction generally will be permitted only on land identified for retention in public ownership. Exceptions may be allowed where investment costs can be recovered as a part of land disposal actions.

Specific road and trail construction standards will be determined based on the following criteria:

1. Resource management needs.
2. User safety.
3. Impacts to environmental values, including but not limited to wildlife and fisheries habitat, soil stability, recreation, and scenery.
4. Construction and maintenance costs.

Detailed Management Plans

The RMP provides general guidance for the PRA. More detailed management plans called activity plans will be prepared to deal with areas where a greater level of detail is required. Activity plans will indicate specific management practices, improvements, allocations, and other information for a particular site or area. They will be prepared for most major BLM programs, including range (allotment management plans), recreation (recreation area management plans), wildlife (habitat management plans), and cultural resources (cultural resource management plans). Where two or more activities have activity planning needs in the same general area, a single consolidated activity plan may be prepared. Coordination, consultation, and public involvement are important in the formulation of activity plans.

Economic and Social Considerations

BLM will ensure that any management action undertaken in connection with this plan is cost-effective (after considering both market and non-market values) and takes into account local, social, and economic factors. Cost-effectiveness may be determined by any method deemed appropriate by the BLM for the specific management action involved.

Environmental Review

An environmental analysis or categorical exclusion review will be completed prior to approval of any project involving public lands. If no significant impacts are identified, the analysis will be documented through an environmental assessment and a finding of no significant impact. If the analysis suggests a major Federal action that would significantly affect the human environment, an environmental impact statement would be prepared.

SUPPORT REQUIREMENTS

Once the RMP is approved, it will require support from many sources in order to be implemented. Support requirements are shown in Table 7.

TABLE 8
SUPPORT REQUIREMENTS

SUPPORT	RESOURCE	REMARKS
Appraisal	Lands, Forestry, Range Management, Wildlife, Recreation	Appraisals must be conducted on those lands identified for transfer, acquisitions, permits, trespass, and rights-of-way. Also, access acquired for timber sales, range and wildlife projects, and recreation developments must be appraised.
Cadastral Survey	Minerals, Wildlife, Range, Lands, Forestry, Wilderness	Identification of public land boundaries may be required for actions such as: mineral disposal, land transfers, timber sales, range projects, wildlife projects, and occupancy trespass settlements.
Access	Forestry, Minerals, Range, Wildlife, Recreation, Cultural, Watershed	Legal access is required for a number of actions such as: timber sales, mineral disposal, range projects, recreation use, wildlife projects, cultural resource management, and watershed projects.

TABLE 8
SUPPORT REQUIREMENTS
Continued

SUPPORT	RESOURCE	REMARKS
Water Rights	Watershed, Wildlife, Range, Recreation	All BLM water developments require water permits.
Engineering	Range, Wildlife, Forestry, Recreation	Engineering design, review, and construction or contract preparation; administration of construction is required for range projects, recreation developments, and road building and maintenance projects.
Fire Management	Range and Wildlife Habitat Management	Technical assistance is required for preparation of prescriptions for prescribed burning and fire management on prescribed burns designed to improve range and wildlife habitat.
	All	Fire suppression, as specified in the RMP for the protection of resource values and property.

CONSISTENCY WITH OTHER PLANS

This proposed plan does not appear to be inconsistent with the officially adopted plans, programs, or policies of other Federal, State, or local governments or with Indian tribes. The public comments to date have shown no inconsistencies.

All or portions of seven counties are located within the PRA. All County Commissions from the seven counties were contacted and their corresponding land use plans were reviewed (if available). As a result of the review, this Draft plan does not appear inconsistent with their officially adopted plans. Coordination with the U.S. Forest Service, Soil Conservation Service, Cities of Pocatello and Soda Springs, and Shoshone-Bannock Tribe does not indicate any inconsistencies.

Agencies, governments, and Indian tribes may notify BLM of inconsistencies with their plans during the 90-day public review period. The final RMP/EIS will document inconsistencies and, if they cannot be remedied, will explain why.

BLM planning regulations provide for a 60-day review by the Governor of BLM's proposed plans/ final EISs or amendments (1610.3-2(e)). The purpose of this review is to give the Governor the opportunity to identify inconsistencies between BLM's proposed plan and State or local plans, policies, or programs. A Memorandum of Understanding (May 3, 1984) with the Office of the Governor has been executed to provide for The Governor's consistency review. In accordance with this Memorandum of Understanding, the BLM has notified the Governor about the Pocatello RMP and will provide the proposed plan and associated final EIS, including BLM's responses to comments on the Draft Plan and EIS, to the Office of the Governor for the 60-day review.

IMPLEMENTATION

Decisions in the plan will be implemented over a period of years and must be tied to the BLM budgeting process. Priorities will be established to guide the order of implementation for each resource and will be reviewed annually to help develop annual work plan commitments for the coming year. New policy, Departmental guidance, or new BLM goals may influence priorities.

Detailed activity plans and environmental assessments may be needed before taking some actions such as timber harvest or range improvement construction. Rangeland improvement projects, for example, will require a site-specific analysis and a review of economic efficiency.

MONITORING AND EVALUATION

The results of implementing the selected RMP will be examined periodically to inform the BLM resource managers and the public of the progress of the plan. The results being achieved under the plan will be compared with the plan objectives.

Monitoring and evaluation will assist the resource managers to:

1. Determine whether an action is accomplishing the intended purpose.
2. Determine whether mitigating measures are satisfactory.
3. Determine if the decisions in the plan are being implemented.
4. Determine if the related plans of other agencies, governments, or Indian tribes have changed, resulting in an inconsistency with the RMP.

5. Identify any unanticipated or unpredictable effects.

6. Identify new data of significance to the plan.

The proposed monitoring and evaluation plan for the PRA RMP is shown in Appendix H of the Draft document. The plan specifies resource components to be monitored and how, when, and where these components will be monitored. Monitoring intensity (the number and frequency of studies) will vary among areas and allotments according to the amount of information that is needed to determine if the plan objectives are being met. If monitoring shows that RMP objectives are not being met, the reasons will be examined closely. An RMP decision may need to be changed even if the problem is due to factors beyond BLM's control, such as changes in the climate or economic factors.

PUBLIC REVIEW AND COMMENT

The Pocatello Draft Resource Management Plan and Environmental Impact Statement was released to the Environmental Protection Agency and the public in January 1987. During the public comment period, which ended April 30, 1987, testimony was received at two formal hearings and in thirty three letters. All letters are reproduced in this final document. Comments are identified and numbered on the appropriate letters, and BLM responses follow the letter section. Comments are those that question the adequacy or correctness of the data or analysis, or provided new information. A verbatim record of both hearings is available for public inspection at the Pocatello Resource Area Office and Idaho Falls District Office.

All letters received are listed below. Only a portion of the letters contain comments requiring a response and are so noted.

Letter #	From	Response Prepared
1.	State of Idaho Department of Lands	X
2.	Thatcher Idaho Residents	X
3.	The Nature Conservancy	X
4.	Eric S. Johnson	
5.	Bureau of Reclamation	
6.	Bureau of Mines	X
7.	Idaho State Historical Society	
8.	Idaho Petroleum Council	X
9.	Yago Ranch	X
10.	Allen J. Kelly, Serrano Intermediate School	
11.	Conda Partnership	
12.	Bonneville Power Administration	X
13.	Mr. & Mrs. Edison D. Jones	
14.	Val Stoddard	
15.	Patti & Ted Pulling	
16.	Robin Hirsch	
17.	John Swanson	

Letter #	From	Response Prepared
18.	Elmer Wilcox, Craig Roberts & Carey Hopkins	
19.	Chevron U.S.A., Inc.	X
20.	Krys Sampson	
21.	Monsanto	X
22.	Paul Bieniasz	
23.	Mike Panting	X
24.	Dale Panting	X
25.	Student Union, Idaho State University	X
26.	Marriner Jensen	X
27.	Wayne Fowler	
28.	The Shoshone-Bannock Tribes	X
29.	Rocky Mountain Oil and Gas Assoc.	X
30.	The Wilderness Society	X
31.	American Rivers	X
32.	Environmental Protection Agency	X
33.	Idaho Fish and Game	X



STATE OF IDAHO

DEPARTMENT OF LANDS

Eastern Idaho Area Office
Route 1, Box 400 (Beeches Corner)
Idaho Falls, Idaho 83401

Telephone: (208) 523-5398

February 26, 1987

Bureau of Land Management
Idaho Falls District Office
940 Lincoln Road
Idaho Falls, Idaho 83401

Attention: RMP/SIS Team Leader

Dear Sir:

The Idaho Department of Lands has reviewed your draft of the 1987 Resource Management Plan and Environmental Impact Statement for the Pocatello Resource Area.

1-1 We were surprised and concerned with your preferred alternative. You do not list those Federal lands adjacent to our Cottonwood Block as being available for acquisition by the State of Idaho through land exchange.

On September 14, 1979, this Department submitted a letter of intent to your State Director indicating our desire to exchange for those Bureau of Land Management lands. It was accepted. We were in turn given a prioritized listing of State lands the Bureau of Land Management would like to acquire in exchange. Since then we have worked with the Pocatello Resource Area office to finalize this exchange package.

We respectfully request that you revise your preferred alternative to include this Cottonwood Land Exchange Package. The 1986 Idaho/BLM Exchange Strategy agreement between our two agencies stipulates that we both consolidate ownership to better achieve efficient and effective management.

Our acquisition of those 6,200 acres of BLM lands adjacent to our 42,000 acre Cottonwood Block and the BLM's acquisition of State lands from their previously submitted prioritized acquisition list meets the exchange criteria. It would be a shame to waste the work by both agencies that has already gone into this exchange proposal.

EQUAL OPPORTUNITY EMPLOYER

FILE COPY 1

Bureau of Land Management
February 26, 1987
Page 2

The legal description for the lands that could be exchanged are as follows:

BLM LANDS THE STATE WOULD ACQUIRE	Acres
T11S, R39E, Section 11,	640
NW Section 13	160
Section 14	640
Section 23	640
W2NE, W2, NWSE,	
Section 24	440
W2, SE Section 25	480
T11S, R40E, NWSW Section 28,	40
S2SW, W2SE, NENE	
Section 29	200
SESE Section 30	40
N2SW, SFSW, SE	
Section 31	280
W2, S2SE, NESE	
Section 32	440
T12S, R40E, Section 6,	640
Section 7	640
SWNW, NWSW	
Section 17	80
Section 18	640
W2W2 Section 19	160
T12S, R38E, SESE Section 13,	40
Total	6,200

STATE LAND OFFERING TO BLM

Legal	Acres	Vicinity
1. Section 36, T8S, R38E	640	Petticoat Peak
2. Section 16, T7S, R46E	440	Stump Peak
3. Section 36, T6S, R35E	640	Chinks Peak
4. Pts Section 36, T8S, R40E	480	Soda Hills
5. Section 16, T9S, R46E	640	Crow Creek
6. Section 16, T8S, R34E	640	Crystal Creek
7. Pts Section 10, T14S, R38E	160	Oxford Slough
8. Section 36, T7S, R43E	640	Schmid Ridge
9. Section 36, T8S, R42E	560	Wood Canyon
10. Section 16, T8S, R44E	480	Dry Valley
11. Section 16, T14S, R45E	640	Harer Point
12. Section 36, T14S, R44E	640	Merkley Mountain
Total	6,600	

Sincerely yours,

L. D. BENEDICK
AREA SUPERVISOR

LDB/jk

February 10, 1987

Bureau of Land Management
Pocatello, Idaho Office
Idaho Falls, Idaho Office

Dear Sirs:

2-1 In regard to the situation that has arisen concerning the exchange of BLM lands to the State of Idaho, we the undersigned are strongly and unanimously opposed to this action.

Such an exchange would undoubtedly present the problems of cattle from the Cottonwood Association coming over the mountain into our BLM leases, having the expense of fencing our private ground, as well as incurring a shorter grazing season. If the State controls this land, they can sell off small parcels of grazing land indiscriminately to the highest bidder, increase the price per AUM, and we will have no recourse in the matter. We also oppose timber sales handled by the State on these lands because unnecessary roads will be built and grazing lands will become weed problems. In certain instances, there is no accessibility to the land only through private ground.

Our main objective is to keep the BLM leases and maintain the tenures as they currently stand. Our farming operations depend to a tremendous extent on keeping our leases, otherwise, our livelihoods will be in jeopardy.

Sincerely,

Current BLM Land Users in the Thatcher, Idaho Area

February 10, 1987

page 2

Bureau of Land Management
Pocatello, Idaho Office
Idaho Falls, Idaho Office

Bureau of Land Management
Pocatello, Idaho Office
Idaho Falls, Idaho Office

- Milton Smith
- Carter Thomas & Son, Inc.
- Doug Carter
- Wesley Miller
- Ben Thompson
- Shay Land & Livestock
- Taylor C. Shave
- Davis Lester Farnsworth
- Davis Lester
- Jack H. Ferguson
- John D. Dayfull
- Garry Confield
- Clifford M. Minkhart
- Ernest Smith
- Terry M. Smith
- Buddy M. Smith

To Whom It May Concern:

I am writing to comment on the Draft RMP & EIS for the BLM's Pocatello Resource Area.

Increased grazing allotments should not be implemented. Grazing is responsible for incredible damage to riparian ecosystems & soils. All grazing should be halted immediately and prohibited thereafter.

Mineral leasing and exploration should likewise be prohibited, because of the damage done to ecosystems and scenic values.

Off-Road vehicle use is extremely damaging, and entirely inappropriate on lands which are to be managed by BLM as steward ORV use is not stewardship. ORV use should be banned. Far more recreationists can be accommodated in a given area if they aren't using ORVs.

Finally, both WSAs in the area should receive wilderness designation to protect environmental values for future generations.

Sincerely,

Eric Seth Johnson
 Eric S. Johnson
 823 N. El Paso, #B
 Colorado Springs, CO
 80903

The Nature Conservancy

Our Forestry Sciences Laboratory
1221 South Main
Moscow, Idaho 83844
208/882-4777

March 5, 1987

Bureau of Land Management
Idaho Falls District
ATT: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Team Leader:

Thank you for the opportunity to review the Draft Resource Management Plan and EIS for the Pocatello Resource Area. The Nature Conservancy's goal is the preservation of a full array of biotic diversity and it is toward this that the following comments are directed.

The RMP has done an outstanding job in proposing the designation of RNA's on the Pocatello Resource Area. In this respect, it is one of the best planning documents I have reviewed. The description, justification, and proposed protection measures and management actions for the seven areas is commendable. One minor suggestion for improvement concerns Formation Cave. In addition to strenuously enforcing an ORV closure, protection of the unique and fragile travertine deposits from ignorant destruction by nonmotorized visitors is also important. This could possibly be accomplished through interpretive signing.

Treatment of rare plants in the RMP and EIS is good. Monitoring of the two unprotected species is a prerequisite first step to developing knowledgeable protection measures.

If you have any questions concerning these comments please feel free to contact me. Thanks again for the opportunity to comment on the Draft RMP and EIS and I look forward to working with the Pocatello Resource Area in the future.

Sincerely,

Bob Moseley
 Bob Moseley
 Protection Planner

CC: Roger Rosentreter, ISD
Craig Groves, Idaho Natural Heritage Program
C.A. Welner, Idaho Natural Areas Coordinating Committee



IN REPLY
REFER TO
PN 150

United States Department of the Interior

BUREAU OF RECLAMATION
PACIFIC NORTHWEST REGION
FEDERAL BUILDING & U.S. COURTHOUSE
BOX 965-550 WEST FORT STREET
BOISE, IDAHO 83724

MAR 11 1987

Memorandum

To: District Manager, Idaho Falls District, Bureau of Land Management,
Idaho Falls, Idaho Attention: RMP/EIS Team Leader

From: *Acting Assistant* Regional Director, Bureau of Reclamation, Boise, Idaho

Subject: Review of Draft Resource Management Plan and Environmental Impact Statement for the Pocatello Resource Area

The subject management plan and environmental impact statement, provided by your letter of January 20, 1987, have been reviewed by our Minidoka Project Office in Burley, Idaho. The staff there found the proposed plan to be consistent with maintaining the land and water resource values that affect our operations. They are also working with your office, where appropriate, on the sale and exchange of land parcels in the Willow Creek watershed.

We appreciate the opportunity to review these documents. Please let us know if we can be of further assistance in your planning process.

Paul D. Roberts
 Paul D. Roberts



United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
EAST 360 3RD AVENUE
SPOKANE, WASHINGTON 99202

Administrative routing stamp with fields for Dist. Dir., Asst. Dir., and dates. Includes 'RECEIVED - Idaho Falls D.O.' and 'APR 06 1987'.

April 2, 1987

The criteria for the development potential for nonenergy minerals is from the Willow Whitman National Forest, Oregon (copy attached).

The criteria for the access categories is that from the Beaverhead National Forest, Montana (copy attached).

Handwritten signature: D'Arcy P. Banister

Memorandum

To: RMP/EIS Team Leader, Bureau of Land Management, Idaho Falls District Office, Idaho Falls, Idaho
From: Supervisor, Mineral Issues Involvement Section, Branch of Engineering and Economic Analysis
Subject: Draft Resource Management Plan and Environmental Impact Statement (EIS) for the Pocatello Resource Area, Idaho

Attachments (3)

Generally, the Pocatello Resource Management Plan is excellent with regard to minerals. However, a point of reference or comparison is needed to allow the reader to understand the significance of some statements. An example is the Minerals Management section on page 24. The first line, second paragraph, states that 598,581 acres are available for nonenergy solid minerals leasing. We would like to see a quantifier such as:

Of the 598,581 acres available for nonenergy mineral leasing, _____ acres have a high potential for development, _____ acres have a medium potential for development, _____ acres have a low potential for development, and _____ acres have an unknown potential for development.

This should be done for each acreage total in each classification.

This office reviews numerous EIS documents and has come across an excellent classification system as shown in attached table II-11, pages II-71 and II-72 of the Beaverhead National Forest OEIS.

We suggest a modification of this, as shown on page 2, using percentages rather than acreages. It is easier to envision the comparison and comprehend the effects each alternative may have on mineral resources. The numbers are the same as the Beaverhead table.

The potential classification consists of five parts, with a range from high potential to very low potential based on current knowledge. The availability classification consists of four categories, including withdrawn, specific legal protection measures, special management conditions, and standard operating conditions. By combining potential with availability and comparing acreages, an excellent statistical representation of minerals availability would be presented.

Table with columns for Mineral Potential Category (MPC) I, II, III, IV, V and Access Category 2 (A, B, C, D). Rows show data for Alt. 1 and Alt. 2, including total acres of potential and percent of total acres affected.

1See attachment 2, from OEIS, Willow-Whitman National Forest, Oregon.
2See attachment 3, from OEIS, Beaverhead National Forest, Montana.

Table II-11

Mineral Evaluation Report

Table II-11: Mineral Evaluation Report. Multiple tables for Alternative A, B, C, and 0, comparing Energy and Non-Energy access categories (Low, Mod, High, Very High) across Access Categories A, B, C, and D.

IDAHO PETROLEUM COUNCIL

Rocky Mountain Oil and Gas Association

Mr. Lloyd H. Ferguson

3

ANDREW G. ANDERSON
EXECUTIVE DIRECTOR

220 N. W. 4th St.
Boise, Idaho 83720
Telephone 333-7400-0000

April 7, 1987

Dist. No.	DATE	ACT.	STATUS	ADDRESS
Adm. Adm. Div.				P.O. Box 147
Adm. Div.				BOISE, IDAHO
RECEIVED - Idaho Falls, ID.				
-220- APR 09 1987 -220-				
Adm.				
Adm. Div. (Bldg. 211)				
Adm. Div. (Bldg. 211)				
Adm. Div. (Bldg. 211)				

Mr. Lloyd H. Ferguson
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Ferguson:

On behalf of the Idaho Petroleum Council, a division of the Rocky Mountain Oil & Gas Association (which is an association representing the major oil companies as well as a majority of the independent exploration and production companies in the Intermountain West), we would like to take this opportunity to submit the following comments:

We support the inclusion of a minerals alternative in the planning process for the Pocatello Resource Area. The inclusion of such an alternative allows members of the energy industry and the public to determine the maximum available opportunities for exploration and development of energy and mineral resources which exist within the Resource Area. It also displays how these opportunities are limited by the Preferred Management Alternative.

Despite the consideration energy and minerals have received in the planning process, we would like to comment on a perceived lack of certain essential plan components which are needed in order to have a defensible document in terms of energy and mineral resources and related decisions.

For example, the planning document should include a discussion of your intent to use the Pocatello RMP as a basis for making oil and gas leasing decisions and that such decisions will not be subject to additional environmental documentation or public scoping. We believe that this discussion should be included in either the section on purpose and need or in Chapter Two which describes the various management alternatives which were considered during the planning process.

We are also concerned with the statement on page 16 of the Plan which relates to Issue No. 10, Mineral Development. You state, "Areas will be identified where there are major conflicts between mineral leasing and exploration and other resources. Generally, when these conflicts occur, an Environmental Assessment will be completed to develop protective stipulations (such as seasonal closures) or mitigating measures which would be tailored to the specific conditions and resources affected." We are unsure whether you mean that an EA will be prepared only at the drilling proposal stage where there are major conflicts or whether an EA may also be prepared before leasing

standard stipulations. Such information would be invaluable to you as well as to the public and industry.

While we support your efforts to classify the PRA in terms of its energy resource potential, we believe you should have included an "Unknown" category. An unknown potential category should have been applied to those areas where data is unavailable or insufficient to make a determination of potential. Of primary concern is the likelihood that areas with unknown potential have been construed as having no or low potential. It is entirely possible that after more site-specific data is obtained the area may be found to have the highest possible potential for oil and gas. Consequently, there is an inherent danger in assigning an area with unknown potential a rating of low or no potential because the planners could designate the area to limited uses, when in fact they should leave the area open to more flexible management practices.

In conclusion, while we support the inclusion of a Minerals Alternative in the planning process, we cannot support it or any of the other management alternatives because we don't believe the planning documents conform to the requirements established by the National Environmental Policy Act. We strongly urge that you make the changes we have recommended in our comments. These changes will make the RMP more balanced and defensible in terms of oil and gas considerations and decisions.

Sincerely,
Andrew Anderson
ANDREW G. ANDERSON
Executive Director

AGA:jbt

ROCKY MOUNTAIN STATES - ENERGY RESOURCES FOR TODAY AND TOMORROW FILE COPY 8

Mr. Lloyd H. Ferguson

2

decisions are made in controversial areas or areas where major conflicts may exist. While we agree that additional environmental documentation is necessary prior to the approval of a drilling proposal, we believe that leasing decisions should be made during the land management planning process. Consequently, we recommend that the statement cited above be clarified as to its actual intent.

This clarification is important because it could conflict with the discussion prepared for Issue No. 11, Availability of Lands for Leasing, which indicates that all lands and mineral estate with high energy values will continue to be made available for exploration and leasing under all alternatives. We strongly support leasing of all potentially valuable lands with reasonable and justifiable stipulations and constraints.

A discussion of possible environmental impacts which could result from the various management alternatives and specific mitigation measures which may be utilized for oil and gas activities should be added to Chapter IV of the DEIS. These types of discussions are required in the section on environmental consequences by 40 CFR 1502.16, which states that "...The discussion will include the environmental impacts of the alternatives including the proposed action..." The regulations also require in Section 1502.16h that the "means to mitigate adverse environmental impacts" shall also be included in the discussion. We are concerned that you have not fully complied with these requirements. Therefore, we recommend that the Chapter on Environmental Consequences be revised to address specific possible conflicts and the available measures which may be used to mitigate any adverse impacts.

In order to provide full disclosure of environmental impacts as required by the National Environmental Policy Act (NEPA), you should include a discussion in the planning documents or an appendix of the various stages of exploration and development of oil and gas, i.e., leasing, exploration, drilling, production and abandonment of the well site. Possible impacts which could arise from such activities should be discussed in generic terms since it is impossible for you to anticipate the extent of mineral exploration and development activity which may occur in the PRA. Nevertheless, it is important for you to indicate what those reasonably foreseeable impacts could be and to discuss the various mitigation measures which could be utilized to avoid or significantly minimize these possible impacts.

A Preferred Alternative map displaying the various oil and gas leasing categories should be added to the plan. While we realize that the planning documents include a map which indicates where no surface occupancy stipulations will be applied, we believe it would be beneficial if you were to illustrate those areas which are withdrawn by statute and by discretion. The current map of the Preferred Alternative is confusing because it indicates that withdrawn areas will be subject to NSO stipulations. This situation should be clarified because it is unclear whether these areas are withdrawn only from appropriation under the Mining Law or whether they are withdrawn from mineral leasing as well. An additional recommendation we would like to make is that you should identify separately on the map those areas which are subject to seasonal constraints and which are available with

Yago Ranch

O. Thayne Thompson
DOWNEY, IDAHO 83234
PHONE 897-5798

April 8, 1987

RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, Idaho 83401

RE: Draft Plan/EIS

Team Leader:

I want to express my views on a section of the Resource Management Plan and EIS (page A-8) as it applies to my allotment-Yago Creek #6049.

If you will view the topography map of this area you will find that none of the #20 acre allotment is within the Downey watershed. All of the allotment that the Plan states is in the Downey watershed drains into the Yago Creek drainage of which we own irrigation and domestic water rights. The southern boundary of this allotment is the ridge between Yago drainage and Nine Mile drainage (Downey watershed).

I strongly object to this stated problem and objective and ask that it be deleted.

Best Regards,

O. Thayne Thompson
O. Thayne Thompson

cc: Area Office Director, Pocatello
Lloyd Ferguson, District Manager

Abnorable and Hard Working Wilderness Study Staff,
(POCATELLO RESOURCE AREA)

Having worked the railroad lines from San Bernardino to Pocatello, I've been fortunate to see the beauty of the Cottonleaf, Barrock, and Bear River Ranges. To go from smog and congested wild areas to open upland surrounded by open spaces is a welcome relief.

I picked up a copy of Idaho's Geographic Series from a fellow teacher in a system where I am now employed. Mr. Neutthner makes a national and visionary argument for adding wilderness areas. In California, I observed miles of T.R. and mining scars on "potential BLM Wildlife". I was even told by a BLM ranger that the Southwest is the focal point of a (sic) NATIONAL SACRIFICE AREA!!! He claimed that BLM lands in Oregon, Idaho, and Wyoming would be optimally maintained if offset close of land here. My 240 students cringe at this.

Since I or part of my students have been to little of proposed W.D. in Idaho, we still feel that we would like maximum wilderness or enhanced wilderness alternatives chosen. From the agencies own studies, much overgrazed land is costly to deal with as far as rehabilitation. O.D. We need to be closely monitored, especially in riparian and archaeological sites. Millions of dollars of the aforementioned areas have been destroyed in California. We believe that a national energy conservation program would eliminate much destruction due to resource exploitation in the Overthroat Belt.

Finally, as a teacher of land/resource use, the nation knows the increasing value of National public lands and money made through recreation: HUNTING, HIKING, MINERAL EXPLORATION/GEOLGY, RAFTING, BIRDING, "Legitimate O.P.V." use. My comment and some student responses support wilderness or

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enhanced wilderness status WITH expansion of lands to form contiguous corridors for species health and diversity

Gratefully,
Oliver J. Kelly
Science Curriculum Coordinator
Bonanza School
3131 E. Budmark
Highland, Ca. 92346



BEKER INDUSTRIES CORP.
PARTNER

CONDA PARTNERSHIP

P. O. Box 37
CONDA, IDAHO 83230



WESTERN CO-OPERATIVE
FERTILIZERS (U.S.) INC.
PARTNER

APRIL 23, 1987

Bureau of Land Management
Idaho Falls District Office
Attn: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, ID 83401

Gentlemen:

As a representative of the Conda Partnership in Soda Springs, Idaho, please accept my comments concerning the draft of the Resource Management Plan and Environmental Impact Statement.

Upon reviewing the Preferred Alternative B, the Conda Partnership has no major objections other than to state that it will be advantageous to the phosphate industry to leave mineral development the same and continue to foster and encourage orderly mineral development.

Sincerely,
Doug Graunke
Doug Graunke
Conda Partnership

11



Department of Energy
Bonneville Power Administration
PO Box 3621
Portland, Oregon 97208 - 3621

APR 23 1987

In reply refer to: SJ

Mr. Lloyd H. Ferguson, District Manager
Idaho Falls District Office
USDI Bureau of Land Management
940 Lincoln Road
Idaho Falls, ID 83401

Dear Mr. Ferguson:

Bonneville Power Administration (BPA) has reviewed the Pocatello Resource Management Plan and Draft Environmental Impact Statement (EIS). We offer the following comments for your consideration.

1. From the standpoint of existing and planned transmission facilities, the preferred alternative (Alternative B) is consistent with BPA programs.
2. The Plan and EIS should address important east-west energy transmission corridor windows identified in the 1977 Pacific Northwest Long Range East-West Energy Corridor Study (enclosed). These windows were found to be the major technically feasible corridors available through the Rockies and Cascades. They are marked as planned corridors on the Alternative B map (enclosed).
3. The corridors identified in the 1980 Western Regional Corridor Study and its 1986 update, compiled by the Western Utility Group (WUG), should also be addressed in the EIS and Plan. The updated study will be mailed to all BLM district offices shortly from the WUG Idaho Coordinator (Idaho Power Company).
4. The Plan and EIS should designate existing and planned energy transmission corridors which cross BLM land. Although BPA has no lines in the area, there are several existing utility transmission lines and oil and gas pipelines. Designation is included in the requirements of the Federal Land Policy Management Act and the Mineral Leasing Act as emphasized in WUG's 1986 Updated Western Regional Corridor Study.
5. Specific management areas that are considered exclusion or avoidance areas for energy transmission corridors should be identified in the EIS and Plan.
6. In general, the Plan and EIS do a good job of addressing renewable energy resources such as geothermal and hydroelectric. However, there are several potential geothermal sites not mentioned which are found on or near Federal lands. These sites are identified in BPA's 1985 Resource Assessment, "Evaluation and Ranking of Geothermal Resources for Electrical Generation or Electrical Offset in Idaho, Montana, Oregon, and Washington," Volumes I and II,

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June 1985. The discussion of alternatives should address the effect, if any, of land use restrictions on geothermal as well as hydroelectric potential. Although there are several potential wind sites found in the area, they are not considered to be technically or economically viable.

We appreciate the opportunity to comment on your Resource Management Plan and Draft EIS, and we would like to remain on your mail list for the final EIS and Plan. If you have any questions on these comments or need more detail on BPA transmission facilities, please contact John O. Hooson, Senior Technical Advisor, Division of Land Resources, Bonneville Power Administration, at 503-230-3299 or (FTS) 429-3299.

Sincerely,

Anthony R. Morrell
Anthony R. Morrell
Environmental Manager

2 Enclosures

cc:
B. Pugh - BLM Idaho State Office

Dear Sirs;

I and all sportsman I know favor Alternative "D" for B.L.M. Land. Ninety nine percent of all Idahoans are sportsman & very few will voice their preference. Idaho is spending lots of money promoting tourism & about the only thing we could possibly offer a tourist is fish & Wildlife.

Sincerely,
Ed Stoddard
144, Canal Creek
Pocatello, Id.
83204

PS Why 15 years? If the ruling you make isn't good & should be changed for the benefit of the majority Why 15 years?

Pocatello, Id.
4-24-87

To Whom It May Concern:—

We are rewriting to let you know that we prefer your alternative "D" for management of public lands.

Thank you,

Mr. & Mrs. Edison D. Jones
3530 Valley Road
Pocatello, Id. 83201

Crystal Spring Rd.
McCammon, Id.
Dear BLM.

Alternative "D" plan
please for our land
management—

Sincerely—
Patte Fulling
Ted Fulling
April 23, 1987

To RMP/EIS TEAM LEADER;

It is imperative that the BLM in the Idaho Falls District employ the ALTERNATIVE D for its management plans.

It is high time that the BLM start managing public land resources for long-term use for everyone.

The BLM has allowed degradation of lands to occur for too long. Please stop acting like a puppet for the ranching and mining industries.

As a taxpayer I have no faith left in the BLM. Please stop charging inappropriate fees for public land resources. It is pathetic you could not even raise the cost of grazing fees.

Set some decent policies, and individuals will stop bad-mouthing the BLM.

Sincerely
Robert Hirsch

28 Apr 1987

B & M
We prefer the "D"
for management of public lands -

I thank you
Elmer Wilhoj
Craig Roberts
Early Hopkins
Georgetown, Ida
83234.

JOHN R. SWANSON
P.O. Box 616
Minneapolis, Minn. 55408
22 April 1987

Biological Resources Management
1900 Franklin Street
Suite 310, White House
Denver, Colorado
Phone: (303) 733-1111

Dear Mr. [Name Redacted]:
I am pleased to hear that you are interested in the BLM's management plan for the Snake River Plain. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one.

With the passage of the Clean Air Act, the BLM is required to take steps to protect the air quality in the Snake River Plain. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one.

With best regards,
John R. Swanson

Enclosed for you are 10 copies of the BLM's management plan for the Snake River Plain. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one. I am sure that you will find the plan to be a sound and logical one.

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Sincerely,
John R. Swanson



M. M. (Lisa) Flesche
 Staff Analyst
 Legislative and Regulatory Affairs

April 29, 1987

Draft EIS and Resource Management Plan
Pocatello Resource Area

Mr. Lloyd H. Ferguson
 Bureau of Land Management
 940 Lincoln Road
 Idaho Falls, ID 83401

Dear Mr. Ferguson:

Chevron U.S.A. Inc. believes that your preferred alternative would allow for a well-balanced, fair, multiple-use management plan.

10-1 However, we have several concerns related to the adequacy of the draft EIS. In particular, we believe that in order to be in compliance with 40 CFR 1502.16, a discussion of the environmental impacts of the various alternatives, as well as the means to mitigate the adverse environmental impacts, must be included. This discussion should also include a general description of the various stages of oil and gas exploration and production.

10-2 Additionally, the EIS should state that the RMP will be used as a basis for making oil and gas leasing decisions, and that such decisions will not be subject to additional environmental documentation or public scoping. On page 6 of the RMP, the first full paragraph states that an Environmental Assessment will be prepared in areas where there are "major conflicts" between mineral activity and other resources. We believe that the Resource Management Plan's EIS should be prepared in order to resolve those conflicts at this point in time. It would unnecessarily encumber the leasing process, as well as your agency, to prepare the RMP's EIS in such a way that leasing decisions could not be made from it.

In order to improve the clarity and increase the usefulness of your proposed plan, we suggest the following:

10-3 1. Your preferred alternative map should differentiate between those areas that are withdrawn from mineral activity and those areas that are subject to no surface occupancy stipulations. These classifications should not be mixed, because leasing can occur on lands subject to NSO stipulations, but not on withdrawn lands.

10-4 2. Your preferred alternative map needs to indicate which of the withdrawn areas are withdrawn from appropriation under the Mining Law, and which are withdrawn from this appropriation as well as from oil and gas leasing.

10-5 3. On page 3-6 of the draft EIS, the map of oil and gas potential is misleading because areas of unknown potential were rated 1, and yet on your map's legend, you state that "1 = lowest potential." There is a tremendous difference between an area of "unknown" versus "low" potential. An area of unknown potential could very possibly become an area of highest potential after more data is acquired. Consequently, the

Northern Region - Exploration, Land and Production

Mr. Lloyd H. Ferguson -2- April 29, 1987

problem with assigning an area with unknown potential a rating of lowest potential is that the land planners could designate the area to limited uses, when it would be more prudent to leave the area open to more multiple uses until more is known about the mineral potential. Therefore, we request the use of an unknown potential classification in addition to your lowest potential classification.

Finally, we appreciate the inclusion of a minerals alternative in your draft EIS. This alternative aids industry in determining the maximum opportunities for mineral and energy resource development, and shows us exactly how these opportunities are constrained under the preferred alternative.

Thank you for your consideration of our views.

Sincerely,

Lisa Flesche
 M. M. (Lisa) Flesche

MMF:js

To Whom it may concern,

I am aware of several proposals being decided upon to determine the use of our "public" lands. As a citizen of Idaho I would like to express my opinion that you chose Alternative D as the right proposal.

I don't believe our "public" lands should be any more exploited by cattle or mining or whatever than they already are.

Please, think about the future & how important our wilderness & forests are just by being what they are, a place of beauty & enjoyment. That is far more important than being temporarily productive.

*Sincerely,
 Kay Simpson
 Pocatello, Idaho*

Vote: ALTERNATIVE D

Monsanto

Monsanto Chemical Company
 P.O. Box 818
 Soda Springs, Idaho 83276
 Phone: (208) 547-3391

April 28, 1987

GENERAL MATERIAL DIVISION			
DATE	TIME	ACT	INIT
APR 30 1987			
ADM			
ADM			
ADM			
ADM			

Bureau of Land Management
 Idaho Falls District Office
 Attn: RMP-EIS Team Leader
 940 Lincoln Road
 Idaho Falls, Idaho 83401

Dear Sirs:

Monsanto Company appreciates the opportunity to comment on the Resource Management Plan and Environmental Impact Statement for the Pocatello Resource Area. The information contained within the RMP-EIS document appears to be an accurate statement of the present status of the BLM administered lands and the concerns of the land users. Also the Preferred Alternative, Alternative B, responds to these concerns in a fair and equitable manner. Management of the public lands under Alternative B should provide for a balanced approach to the use of these areas. Indeed, the Preferred Alternative is an excellent example of the multiple and balanced use of the public lands within the Pocatello Resource Area.

21-1 However, this document must be viewed as a framework upon which to build the future of these lands. Neither man nor his environment are static entities. The needs of the public land users and the ability of the public lands to meet those needs are ever changing. An area deemed to be of low mineral potential today may, with changing technology and economics, become a prime exploration and development possibility, for example, the development of low grade precious metal deposits in Nevada. Or what may be prime wildlife habitat today, because of the natural progression of species or nature, may be prime timber or grazing land in the future. Hopefully, the process and input begun with this RMP-EIS process will continue and will be used to guide the balanced use of the public lands.

21-2 We would also urge the extension of cadastral surveys of the public lands within the Pocatello Resource Area beyond present limits. Too many of these lands lie some distance from the nearest established section corners for an accurate estimation of lease or allotment boundaries.

Sincerely,

David W. Farnsworth
 David W. Farnsworth
 Supervisor - Mine Production
 Planning, and Control

DWF:ls

To THE RMP/EIS TEAM LEADER;
I urge the BLM, Idaho Falls District
to implement ALTERNATIVE D for
its management plans.

There is no need for unwise
management to continue. There has
already been too much degradation
allowed to occur of crucial riparian
habitat. You must manage our
Public Lands for long-term multiple
use.

As a taxpayer I am sick of the
BLM's partiality to ranchers and miners.
The BLM must not continue to be
short-sighted due to political pressures.

Please start managing our Public
Lands wisely and apply ALTER-
NATIVE D so our lands have some
future.

Sincerely, an avid hunter;
Paul B. Berman

areas must be protected. All ELM tracts within this area must be managed to protect the visual resource. The scenic beauty, endangered whooping cranes, bird watching, photography, camping, hiking, and big game hunting are major factors supporting the growing recreation and tourism industry of the Grays Lake, Caribou Mountain, Tincup Highway 34 areas.

The ELM needs to start protecting and rehabilitating streambank and riparian areas. Fish habitat has been severely degraded on many streams in southeastern Idaho. The recreational fishing resource can be revitalized for the economic benefit of southeastern Idaho with streambank rehabilitation and good riparian management.

Thank you for the opportunity to comment.

Mike Panting

22

April 25, 1987

Mike Panting
1960 Panting Lane
P.O. Box 631
Soda Springs, Idaho
83276

Oale Panting
7013 S. 2310 N.
West Jordan, Utah
84084

Bureau of Land Management
Idaho Falls District Office
ATT: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, Idaho 83401

Bureau of Land Management
Idaho Falls District Office
Att: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, Idaho 83401

Submitted for the Hearing Record: Pocatello Resource Management Plan and EIS, Draft 1987.

For the Hearing Record: Pocatello Resource Management Plan and EIS

23-1 First I would like to applaud the recommendations for Research Natural Areas and Areas of Critical Environmental Concern mentioned in the draft Pocatello Resource Management Plan and EIS. However the document is greatly flawed because there is no mention of protecting the Formation Spring Watershed. Formation Spring provides drinking water for the City of Soda Springs. Page 6-3 of the document describes the protection given to the City of Oowney's municipal watershed, by means of mineral entry withdrawal and an Area of Critical Environmental Concern recommendation. The Formation Spring watershed deserves equal forms of protection. At a minimum, the 340 acre parcel of ELM land directly above and to the east of Formation Spring needs to be withdrawn from mineral entry and designated an Area of Critical Environmental Concern for the Formation Spring watershed. This 340 acre parcel encompassed the west facing slopes above Formation Spring. The visual quality of these west facing slopes and the entire Formation Spring and travertine deposit areas must be protected.

23-2 In regards to whooping crane habitat, all 894 acres of ELM land near Grays Lake Wildlife Refuge should be put under cooperative agreement with the U.S. Fish and Wildlife Service for management as whooping crane habitat. These ELM lands are within the whooping crane critical habitat designation area published in the Federal Register of May 15, 1978. I have observed hundreds of sandhill cranes using the lower west slopes of Caribou Mountain as habitat. Whooping cranes will follow sandhill cranes and use this swamp-forest edge habitat also.

The visual resource in the Grays Lake, Caribou Mountain, Tincup Highway 34

The Draft Pocatello Resource Management Plan is seriously flawed for its lack of addressing the Formation Spring Watershed. Formation Spring supplies drinking water for the City of Soda Springs, Idaho.

24-1 Formation Spring also supplies irrigation and fish propagation water for water right owners on Formation Spring. As a landowner and owner of water rights on Formation Spring, I have a personal interest in seeing the water quality of Formation Spring protected for the residents of Soda Springs, and us other water right owners.

There is a 340 acre parcel of ELM land directly above and east of Formation Spring, and another 110 acre parcel of ELM land farther to the east that needs to be withdrawn from mineral entry and designated municipal watershed for Formation Spring. Ideally, all ELM parcels east of Formation Spring to the top of the drainage divide on Aspen Range should be included in the Formation Spring Watershed designation.

I find it ironic that the ELM is willing to protect the City of Downey Idaho's Municipal Watershed with an 1855 acre mineral entry withdrawal, and an Area of Critical Environmental Concern designation (page 6-3), but makes no mention of protecting the City of Soda Springs Municipal Watershed on Formation Spring. Watershed protection of Formation Spring should have the highest priority in management of ELM parcels east of Formation Spring, to the top of the drainage divide on Aspen Range. These ELM parcels are located in Section 27, 26, and 25 Township 8 South Range 42 East, and add

23

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24

up to a very small amount of acreage to withdraw from mineral entry. The parcels and acreage would be Section 27--340 acres, Section 26--110 acres, Section 25--300 acres, for a total of approximately 750 acres.

I trust you will take this into consideration, and fully address the Formation Spring Watershed in the final Pocatello Resource Management Plan.

Gale Panting

Gale Panting

normally have to set up the hut during the hunting season, and because of wet conditions in the spring, we sometimes wait until end of May or early June to remove the hut.

If road access--or even off road vehicle access--is opened through the Moonlight area, the potential for vandalism will be greatly increased.

We hope that you will consider providing some protection to the hut system while the management plan is developed.

Sincerely,

Ron Waters
Ron Waters, Director
ISU Outdoor Program

**STUDENT UNION
IDAHO STATE UNIVERSITY
Pocatello, Idaho**

83208-0009

Dist. Mgr.	Init.	Act.	File
Asst./Adm. Mgr.			
Adm. Sec.			
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UNID APR 30 1987 BLM			
Adm. Sec. Bldg. RA			
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Adm. Sec. Bldg. RA			

April 21, 1987

District Supervisor
Pocatello Resource Area
Idaho Falls District--BLM
940 Lincoln Road
Idaho Falls, ID 83401

Area Code 208

Director
236-2427

Gentlemen/Ladise:

Asst. Director

RE: Comments on Pocatello Resource Area Management Plan

Program and
Recreation Director
236-3451

We would like to make some comments on the Pocatello Resource Area Management Plan and its relation to the Portneuf Range Winter Hut System.

Reservations and
Catering
236-2287

As a bit of background, the Portneuf Range Winter Hut System is a series of five huts which are available to snow shoe and cross-country skiers. Last winter the hut system was featured in Outside magazine. It was listed among a dozen other resorts and locations which the magazine's editors felt represented some of the best cross-country ski opportunities in the United States.

Games Area
236-3335

The huts are sited on a combination of Forest Service, private and BLM land. In particular, the Moonlight hut is located on BLM land, on the east side of Moonlight Mountain. A BLM special use permit was obtained. The hut is primarily reached from the Rapid Creek Ski Area, where the Pocatello Nordic Ski Association, in combination with the City of Pocatello, the ISU Outdoor Program, and the private land owner have established a series of cross-country trails which are occasionally groomed during the winter. Of all of the huts available, the Moonlight hut is the most ideal for families and beginning skiers.

Maintenance Supervisor
236-3781

Outdoor Program
236-3912

Our concern with the management plan is the possible road access to be opened up through this piece of BLM land on the east side of Moonlight Mountain. Presently, access is partially blocked because of the poor condition of the road and because of private land ownership.

Craft Shop
236-3281

Wilderness Rental Center
236-2945

If access is improved or encouraged then it will greatly increase the potential of vandalism of the Moonlight hut. The hut is removed in the spring and set back up in the fall. Because the hut is a temporary structure, made of canvas and not locked, it is particularly vulnerable early in the spring and late in the fall. Because of weather concerns, we

Paging
236-2296

Campus Information
236-2700

POCATELLO, IDAHO, SUNDAY, NOVEMBER 14, 1986 IDAHO STATE JOURNAL SECTION D PAGE 5

Magazine Touts Local Yurt System

Pocatello is being touted as a telemark's haven in the December issue of Outside magazine for its public yurt system, one of the first in the nation.

"Pocatello, Idaho, would hardly seem to qualify as the ski capital of the intermountain West," freelance Nancy Shute writes in a small piece of a larger article entitled "Free-heating: A Skinny Ski Symposium."

"No soaring, snowcapped peaks. No majestic pine forests. Nothing but barren high desert rolling away to a featureless horizon," she writes.

But the "five huts scattered along a 40-mile curve in the Portneuf Range" between Pocatello and Lava Hot Springs are well placed for excellent cross-country skiing, she notes. A color picture of Pocatelloans enjoying the yurts on a sunny winter evening accompanies the story.

The article quotes Ron Waters, director of Idaho State University's outdoor program and who is currently off trekking in Nepal on a visit to the Mt. Everest base camp.

as saying it's the treeless terrain that makes the yurt system so attractive.

"It's ideal for telemark skiing," he told Shute. "There are lots of open hillsides to practice turns on, and we don't have many problems with avalanches."

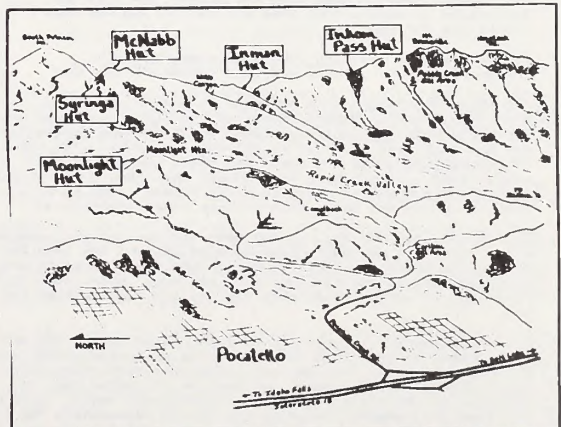
The Outside article explains that the yurt system is a cooperative venture between ISU, the Pocatello Parks and Recreation Department, and the Pocatello Nordic Ski Association, the three of which commissioned Stanley Basin yurtmeister Kirk Bachman to build the system three years ago, the article says.

The yurts sleep six to 14, rent for \$20 to \$65 depending on the day of the week and residency, and are equipped with a stove, lanterns and firewood. They can be reserved by contacting the ISU Wilderness Rental Center, 236-2945.

The mention of Pocatello in Outside is part of a larger article covering some of the better cross-country ski resorts and opportunities

in the United States, from Michigan to Alaska. It rounds out the compendium of ski-related pieces with numerous short articles on equipment and tips for how to do it and what to take along.

Among the handful of correspondents who write the articles is Sun Valley's Penelope Street, who offers tips on telemarking technique.



Yurt System

The map shows the location of the five yurts that have been built on the Portneuf Range. The huts are well placed for cross-country skiing. The local yurt system is discussed in the December issue of Outside magazine.



Bear River Outfitters

Star Route No. 1
Montpelier, Idaho 81254
4-29-87



April 30 1987

Pocatello RMP
Pocatello Resource Area
Bureau of Land Management

Dear Sir;

I have look over your studies and feel the that Alternative D is the most acceptable plane. But feel it isint offering enough restriction on ORVs mainly 4x4's which are traveling any where they wish and making new roads over every ridge. This isint good for the trian and is a stress on big game and other wild live. The area of R45E^{R46E} and Township 112, 13, 14, 15, 16, are critical areas for big game and should have limited access to all ORV Confining them to necessary access roads.

Please take this into consideration.

Sincerely

Marriner Jensen



Marriner and Sel Jensen
208-847-0263

Bernard Sparks
208-847-1881

26

April 30 1987

Bureau of Land Management
Idaho Falls District Office
Attention: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, Idaho 83401

Please enter this letter into your file for consideration of adopting the alternative "D" plan for the 236,357 acres of land presently under control of the BLM in Southern Idaho.

I am a native Idahoian having lived all but 8 years in Idaho. During the past fourteen years, I have seen the quality of the land under BLM authorization go downhill.

I have seen the country padlocked from the public with NO TRESSPASSING signs posted at the gates. I have seen roads cut, county roads fenced from the public, the land so overgrazed by cattle that they are down to eating sage themselves for food.

I have seen the wildlife take a backseat to man's "prosperity" only to have the land ruined for any use.

All these incidences have happened in the country from Wolverine Creek to Manassa Creek on the Blackfoot River Road. The old county road going up Cedar Creek has been padlocked for the past five years while all those friendly with the "landlord" have keys for their own entry and use of the public land. I have been ordered off this land under threat of personal physical abuse to my or others in my party's body if we did not leave this "private land" immediatley.

We, in this day and age, do not need bullies leasing land to private use. I can appreciate someone leasing the land for grazing purposes, but fail to see in the lease contract where they can cut all the firewood they can haul, shoot game and birds out of season, overgraze and use the land as they see fit.

I used to be able to come to the Idaho Falls office and ask for someone to look into the incidences of locked gates, etc. In fact, the locks from certain gates were even removed for about a year but were again put back on the gates when it appeared no one would bother the "landowners" again. I would say that the reports issued by the person responsible for the stewardship of this area of country are completely false. Altho I cannot prove to the contrary, I hear that the person

27

80

doing this work is receiving compensation in monies and access.

I have hunted and fished in other areas of Southern Idaho where different people have stewardship over the areas, and have found fewer cattle with more grass and more cover and food for the wildlife, and public access. It is simply the way all public lands should be kept.

After having seen beaver dams blown, land ravaged and pilaged, access blocked and threatened, I have started going heavily armed simply to avoid any further abuse from the respective people either who have leases from the BLM or people employed by them. If it were not for the fact that my family was from this area and it still is home to me, I would probably stop going and give into the new tenants, but I feel that would be doing me and them both an inservice. I want my children to enjoy the sights and areas I have always cherrished. To be able to hunt or fish or simply enjoy a hike thru the hills of BLM land in this sitting appears to not be that big of a request that ALL should be able to do the same, not just a "lucky few of the landowners friends".

I thank you for letting me write to you and expressing my views of the management of the BLM land.

Sincerely,

Wayne Fowler

Wayne Fowler
221 Maplewood
Pocatello, Idaho
83204

The SHOSHONE-BANNOCK TRIBES

FORT HALL INDIAN RESERVATION

Land Use Director (208) 238-3824
Assistant Director (208) 238-3825
Water Resources Engineer (208) 238-3827
Secretary (208) 238-3823
Planning Aide (208) 238-3823



LAND USE
P. O. BOX 306
FORT HALL, IDAHO 83203

April 28, 1987

Mr. Lloyd H. Ferguson
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Ferguson:

Review of the Pocatello Resource Management Plan and Environmental Impact Statement has been completed. The document in general is well done and the preferred alternative represents a satisfactory balance of natural resource uses. However there are several areas needing further clarification, and several areas needing further analysis.

Following are specific comments which are intended to be constructive.

P. 15. The Shoshone-Bannock Tribes support the criteria in Issue #9 on Shoshone-Bannock Off-Reservation Rights in which no public lands within ceded areas will be disposed of through sale.

26-1 P. 17 and 29. The statement that "BLM will manage cultural resources so that representative samples of the full array of ...cultural values will be maintained..." is unacceptable. As pointed out on pages 58, 59 and 60, numerous federal laws require the protection of all cultural resources - not merely representative samples.

26-2 P. 18. The statement that "in most cases, vehicle access is the needed type of access" must be carefully analyzed. Not every location should be readily accessible by vehicle. In many cases opportunities for solitude should be provided, in others wildlife values should be protected. In some cases hiking/trail easements would be the access method of choice.

P. 23. The designation of the Upper Blackfoot River and Morgan's Bridge for intensive development should be coordinated closely with the Shoshone-Bannock Tribes since the Blackfoot River forms

28

the Northern boundary of the Reservation. Major tribal concerns not adequately addressed in this section or in the EIS section (P. 4-31) are:

- 20-3 Increased non-Indian trespass on adjacent or nearby Reservation land.
- 20-3 Increased littering, vandalism and poaching on adjacent or nearby Reservation land.
- Potential decreases in water quality as a result of increased recreational use.
- Potential losses of cultural artifacts as a result of increased recreational use.

20-4 The statement on page 23 that "Protection of sensitive and significant resources ... will be ensured, consistent with federal and state law" is very non-specific and does nothing to address specific resource concerns. Such a statement is a platitude and as such is without real value in a resource management plan. Issue-specific concerns must be addressed - such as water quality, vandalism, littering, poaching, trampling and destruction of riparian vegetation, etc.

20-5 P. 26, 38, 52, 3-17 and 3-19. Allowing over-snow vehicles in big game winter range with restrictions is highly questionable. Without adequate enforcement, which given the past record is by no means assured, such restrictions will be meaningless. As stated on P. 4-31 there are numerous opportunities available for over-snow vehicles outside of closed areas. Use of these areas should be emphasized.

20-6 The BLM should work closely with the Shoshone-Bannock Tribes in developing such a SRMA on the Blackfoot River to prevent conflicts and riparian area degradation.

20-8 S-9. Table s.1, Wildlife Management Section B. Habitat Acres. It is not clear how the classification of "Satisfactory" or "Unsatisfactory" is derived and why these figures vary from alternative to alternative. Please clarify.

20-7 P. 25, 32, 36, 2-6. The sections on Lands are very unclear and fragmented. It appears that a total of 17,068 acres are considered for disposal actions in the preferred alternative. However it should be clarified that only 8,944 will actually leave federal ownership, since 8,124 would be exchanged (p. 25). The other point that is not clear is the statement that "the BLM would attempt to acquire 9,587 acres of private land and 9,880 acres of State land" (page 25). Then on p. 36 it is stated that "the BLM would also attempt to acquire 9,687 acres of private land and 15,720 acres of state land primarily through exchange". There is a discrepancy between 9,880 and 15,720 acres of State land - please clarify whether the BLM desires to acquire 9,880 or 15,720 acres of State Land.

Further clarification should be given on the acquisition of 9,587 acres of private land and the 9,880 acres (or is it 15,720 acres?) of state land. Where is this land and what are the BLM's criteria for determining which land to acquire? What are the goals to be achieved by such acquisition? The environmental consequences section does not address the potential effects of such acquisition on public recreation, wildlife, range.

In general the acquisition of land by the BLM is to be commended, especially if that acquisition is used to secure, protect and manage critical wildlife habitat, riparian and wetlands, recreation and cultural resource areas. The Tribes' would certainly support and recommend such action. Further clarification on this point should be given.

P.3-16 states that "excessive livestock utilization on riparian areas has existed ever since livestock was introduced on public land" and that "129.5 miles of riparian acres receive heavy livestock grazing". Page 3-15 also states that one of the significant problems affecting range management is livestock concentrating on riparian areas. P. 3-16 states that poor livestock distribution occurs throughout the PRA due to lack of adequate salt and water distribution, lack of fencing and field enforcement. On page 30 the management objective under the preferred alternative for riparian and water quality is to manage 20.15 miles of stream to improve riparian habitat and water quality. This is inadequate given the fact that of the 129.5 miles of heavily impacted riparian areas, 70.89 miles of stream are in fair, good and excellent condition (p. 30). That leaves an apparent 58.61 miles in presumably poor condition (though this figure is apparently not mentioned anywhere in the document). Riparian areas in good condition are critical to wildlife, fisheries and water quality. More emphasis should be placed on

20-9 upgrading the 58 miles of riparian areas in poor condition than is proposed under the preferred alternative. Alternative D which calls for improvement of 34.15 miles of riparian habitat represents a more appropriate approach.

As mentioned on P. 3-16, riparian areas can be improved by improving livestock distribution. Recognizing that government budgets have been hard hit by the current Administration, some actions can still be done with minimum cost such as relocating salt, and prohibiting season-long grazing on riparian areas.

20-9 P. 33 and P. 34. A minor point: P. 33 states .3 mbf per year allowable cut while P. 34 uses a figure of .4mbf approximate allowable cut. Please clarify.

20-10 P. 37 states "seeding would be done in areas where a native perennial seed source is not available". The nature and type of this seeding is not mentioned anywhere in the RMP. An adapted native seed mix of grass, forbs and shrubs should be used. The exclusive use of exotics such as crested wheatgrass no longer have a place in balanced resource management.

P. 43 "BLM policy in reality action will:" I assume the correct term is reality action.

20-11 P. 45 The use of land use permits under Sec. 302 of FLPMA is not a suitable measure for resolving unauthorized use problems. Unauthorized uses are by definition illegal and violators should be punished in the event of deliberate violation. Such use should be curtailed and violators should not be rewarded with a land use permit. This appears to be a stopgap measure to overcome a severe shortage of enforcement. In the event of inadvertent trespass, notice should be given that possible trespass exists and further clarification will be given upon final land use/status determination.

20-12 P. 53 In animal control programs the Idaho Fish & Game Dept. should also be consulted.

20-13 p. 55 "A mixture of grasses, forbes, and shrubs should be used in all range rehabilitation or improvement projects". The emphasis on these seed mixes should be on adapted native species. Exotics should be avoided.

P. 57 One of the most seriously neglected areas in the RMP is the need for enforcement provisions and obtaining the necessary funding and staffing required to carry out adequate enforcement.

20-14 For example the RMP contains blithe statements that restrictions and closures will be established for specific roads, trails or areas with problems (p. 57), restrictions on grazing (p.4-33) to protect ACEC's. In another area (p.39) activity plans for cultural resources would be designed to reduce vandalism and artifact removal. These actions, of course, are very desirable; however without adequate enforcement little will be accomplished. The BLM should not develop programs such as the Blackfoot River SRMA, cultural site developments or riparian area improvements without adequate enforcement capability. The result of such efforts will certainly look good on paper. However what actually happens in the field could fall far short of the enthusiastic and idealistic statements occurring throughout this RMP.

P. 4-30. Land disposal actions have disproportionately affected wildlife. 2,658 acres of big game winter range would be eliminated. 1,570 acres of sage grouse and 120 acres of sharp-tailed grouse habitat would be eliminated. This is clearly in conflict with the criteria listed on P. 43:

d. Nesting/breeding habitat for game animals

e. Key big game seasonal habitat

20-15 Every effort should be made to retain wildlife habitat in public ownership, whether it be federal or exchange with the state. It is not clear that the range improvement "would offset any loss from land disposals ...". By the BLM's own admission in the last paragraph on p. 4-30 some of the range program would benefit and some would be negative (loss of cover and forage) on wildlife. It is very difficult to see how the range program would entirely offset the loss of habitat through land disposal.

20-16 Land disposal actions under the preferred alternative would dispose of 7.31 miles of riparian habitat, 40 acres of marsh-wetland and 3.3 acres of Bear Lake shoreline. These are riparian/wetland areas are again critical wildlife areas and should be retained in public ownership to ensure the maximum protection of those values.

20-17 In addition, the BLM is aware of the Shoshone-Bannock Tribes' treaty rights for grazing, timber cutting, hunting and fishing within the Ceded Area (p. 15). However the Tribes also have off-Reservation rights to hunt and fish on unoccupied federal land guaranteed under the 1868 Fort Bridger Treaty which go beyond the Ceded area. The BLM has a trust responsibility to insure the continuation of federal ownership of lands that will guarantee the opportunity to exercise treaty hunting and fishing rights.

Mr. Lloyd Ferguson
April 28, 1987
Page 6

Another key item that must be addressed in considering land disposal comes from Section 203 of FLPMA which states:

3. Disposal of the land will serve important public objectives that can be achieved prudently or feasibly only if the land is removed from public ownership, and these objectives outweigh other public objectives and values that would be served by maintaining the land in Federal ownership.

20-18 It is extremely difficult to justify the fact that public objectives that could be achieved only by disposing of these riparian, wetland, big game, and sharp and sage grouse habitats can outweigh the public objectives that could be achieved by maintaining those lands in public ownership. No analysis of this issue is provided in the RMP. This is a critical issue and must be addressed in detail.

It is also possible that isolated BLM tracts that provide good wildlife food and cover serve as habitat islands. These islands can serve a valuable role in restocking adjacent depleted lands by acting as wildlife reserves.

20-19 P. 4-30. "The range program is proposing 11,240 acres of brush control to increase livestock forage production." Remember that one of the major planning issues is Issue #4 - Protection of Wildlife Habitat. Remember also that single use resource management is inconsistent with FLPMA. Brush control projects can be properly designed to accommodate both livestock and wildlife by limiting opening sizes, increasing edge effect, retaining important thermal and hiding cover areas, and planting with suitable adapted native species. The RMP is extremely vague on how brush control projects would be designed. Key wildlife areas such as sage and sharp-tailed grouse leks and nesting areas, as well as big game winter should be identified and managed for those species. Blaisdell et al (1982) contains guidelines for integrating wildlife into range programs. This should be consulted. These efforts should also be coordinated with the Idaho Department of Fish and Game. Brush control on key big game winter range may have significant negative impacts by removing necessary thermal cover. Careful planning must be done to maximize the value of the winter range to big game. Range improvement activities should be focused on non critical wildlife habitat.

P. 4-32. The Shoshone and Bannock cultures have existed on the PRA for thousands of years. Any cultural resource designations

Mr. Lloyd Ferguson
April 28, 1987
Page 7

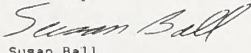
and management of specific sites for their educational, recreational and interpretive values must be closely coordinated with the Shoshone-Bannock Tribes.

20-20 P. 4-34. The statement that "a balanced approach to natural resource management would reduce cultural resource mitigation workloads, and should reduce inadvertent cultural resource mitigation site damage and destruction" is vague. By "balanced approach" I must assume that cultural resources would receive equal consideration with other values such as range and ORV use; and that if potential conflicts are anticipated under a certain use (i.e. range improvement) that use would be deferred to a more suitable location.

20-21 P. 4-34. Cultural resource management plan preparation and implementation should be closely coordinated with the Shoshone-Bannock Tribes.

Thank you for the opportunity to review and comment on this Draft RMP.

Sincerely,


Susan Ball
Environmental Coordinator



Dist. Mkt.	APR	APR	APR
App. Adm. Div.			
Adm. Div.			
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MAY 04 1987			
BLM			
Adm.			
AM Div. Butte RA			
AM Div. Lower RA			
AM Div. Upper RA			

1860 Lincoln Street, Suite 404 • Denver, Colorado 80295
303/860-0099

April 30, 1987

Mr. Lloyd H. Ferguson
Bureau of Land Management
940 Lincoln Road
Idaho Falls, ID 83401

Dear Mr. Ferguson:

On behalf of the Rocky Mountain Oil & Gas Association (RMOGA), I am taking this opportunity to comment on the Draft Environmental Impact Statement (OEIS) and proposed Resource Management Plan (RMP) for the Pocatello Resource Area in Idaho. As you are aware, RMOGA is a trade association comprised of hundreds of members who account for more than 90% of the oil and gas exploration, production and transportation activities in the Rocky Mountain West. Consequently, we are vitally interested in how the BLM manages its lands in conjunction with these uses.

We support the BLM's inclusion of a minerals alternative in the planning process for the Pocatello Resource Area. The inclusion of such an alternative should allow members of the energy industry and the public to determine the maximum available opportunities for exploration and development of energy and mineral resources which exist within the Resource Area. It should also display how these opportunities are limited by the Preferred Management Alternative. In any event, such a comparison should be helpful in our efforts to review the plan and should aid BLM in its efforts to make tradeoff decisions during the planning process. We are concerned, however, that there are only minor differences between the Current Direction, Preferred, and Minerals Alternatives. It would seem to us that the Minerals Alternative should contain the minimum legal standards for environmental protection as required by law. Yet the Minerals Alternative proposes 3,514 acres of discretionary closures and almost 28,000 acres if NSO stipulations, as compared with 10,514 acres of discretionary closures and 30,499 acres of NSO stipulations in the Preferred Alternative. Unfortunately, we do not believe that there are any significant differences between the two alternatives.

20-1 With regard to the discretionary closures and the areas subject to NSO stipulations, it is unclear where or why this proposed management is being applied. One part of the plan indicates that ACECs/RNAs will be subject to NSO

April 30, 1987

Mr. Lloyd H. Ferguson
Bureau of Land Management

page two

stipulations while another part of the plan indicates that parts of these areas will be closed to leasing. We recommend that the BLM provide consistent, clear prescriptions in the plan regarding leasing in these areas. The justification for these decisions should also be included.

20-2 We believe public lands should remain open to exploration and development activities subject to the minimum level of environmental protection required by law. The numerous statutes and regulations which govern the manner in which energy activities may take place afford more than adequate protection of sensitive surface resource values. Therefore, we see no reason to arbitrarily increase the restrictions which may be applied to oil and gas leases and subsequent operations.

Despite the consideration energy and minerals have received in the planning process, we would like to comment on a perceived lack of certain essential plan components which are needed in order to have a defensible document in terms of energy and mineral resources and related decisions.

20-3 For example, the planning document should include a discussion of the BLM's intent to use the Pocatello RMP as a basis for making oil and gas leasing decisions and that such decisions will not be subject to additional environmental documentation or public scoping. We believe that this discussion should be included in either the section on purpose and need or in Chapter Two which describes the various management alternatives which were considered during the planning process.

20-4 We are concerned with the statement on Page 16 of the Plan which relates to Issue No. 10, Mineral Development. The BLM states, "Areas will be identified where there are major conflicts between mineral leasing and exploration and other resources. Generally, when these conflicts occur, an Environmental Assessment will be completed to develop protective stipulations (such as seasonal closures) or mitigating measures which would be tailored to the specific conditions and resources affected." We are unsure whether the BLM means that an EA will be prepared only at the drilling proposal stage where there are major conflicts or whether an EA may also be prepared before leasing decisions are made in controversial areas or areas where major conflicts may exist. While we agree that additional environmental documentation may be necessary prior to the approval of a drilling proposal, we believe that leasing decisions should be made during the land management planning process. Consequently, we recommend that the statement cited above be clarified to indicate that the plan will serve as the leasing document but that subsequent environmental analysis will be performed at the drilling stage.

This clarification is important because it could conflict with the discussion prepared for Issue No. 11, Availability of Lands for Leasing, which

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Mr. Lloyd H. Ferguson
Bureau of Land Management

page three

indicates that all lands and mineral estate with high energy values will continue to be made available for leasing and exploration under all alternatives. We strongly support leasing of all potentially valuable lands with reasonable and justifiable stipulations and constraints. A discussion of possible environmental impacts which could result from the various management alternatives and specific mitigation measures which may be utilized for oil and gas activities should be added to Chapter IV of the OEIS. These types of discussions are required in the chapter on Environmental Consequences by 40 CFR 1502.16, which states that "... The discussion will include the environmental impacts of the alternatives including the proposed action ...". The regulations also require in Section 1502.16(h) that the "means to mitigate adverse environmental impacts" shall also be included in the discussion. We are concerned that the BLM has not fully complied with these requirements. Therefore, we recommend that the chapter on Environmental Consequences be revised to address possible activities and the available measures which may be used to mitigate any adverse impacts. Specifically, the scope of Chapter IV should be limited to the decisions being made by the proposed action, that is, oil and gas leasing. It should be made clear that any additional activity proposals would require further environmental documentation.

20-5

In order to provide full disclosure of environmental impacts as required by the National Environmental Policy Act (NEPA), the BLM should include a discussion in the planning documents or an appendix of the various stages of exploration and development of oil and gas, i.e., leasing, exploration, drilling, production, and abandonment of the well site. Possible impacts which could arise from such activities should be discussed in generic terms since it is impossible for the BLM to anticipate the extent of mineral exploration and development activity which may occur in the Pocatello RA. Nevertheless, it is important for the BLM to indicate what those reasonably foreseeable impacts could be and to discuss the various mitigation measures which would be utilized to avoid or significantly minimize them.

20-6

A Preferred Alternative map displaying the various oil and gas leasing categories should be added to the plan. While we realize that the planning documents include a map which indicates where no surface occupancy (NSO) stipulations will be applied, we believe it would be beneficial if the BLM were to illustrate those areas which are withdrawn by statute and by discretion. The current map of the Preferred Alternative is confusing because it indicates that withdrawn areas will be subject to NSO stipulations. This situation should be clarified because it is unclear whether these areas are withdrawn only from appropriation under the Mining Laws or whether they are withdrawn from mineral leasing as well. An additional recommendation we would like to make is that the BLM should identify separately on the map those areas which are subject to seasonal constraints and which are available with standard stipulations. Such information is invaluable to the BLM as well as to the public and industry.

20-7

April 30, 1987

Mr. Lloyd H. Ferguson
Bureau of Land Management

page four

While we support the BLM's efforts to classify the RA in terms of its energy resource potential by obtaining mineral data from industry, including members of RMOGA, we do not support the use of a dual rating system as displayed in Appendix G. In our view, geologic potential can only be estimated based upon geologic favorability. The "Level of Confidence Scheme" used by the BLM relies on available data to support the existence of mineral potential. If an area has not experienced considerable exploration activity, there will be little available data; however, the lack of data is not a reasonable indication that an area does not contain significant potential for energy and mineral resources.

20-8

Furthermore, we believe the BLM should have included an "unknown" category. An unknown potential category should have been applied to those areas where data is unavailable or insufficient to make a determination of potential. Of primary concern is the likelihood that areas with unknown potential have been construed as having no or low potential. It is entirely possible that after more site-specific data is obtained the area may be found to have the highest possible potential for oil and gas. Consequently, there is an inherent danger in assigning an area with unknown potential a rating of low or no potential because the planners could designate the area to limited uses, when in fact they should leave the area open to more flexible management practices.

20-9

In conclusion, while we support the inclusion of a Minerals Alternative in the planning process, we cannot support it or any of the other management alternatives because we do not believe the planning documents conform to the requirements established by the National Environmental Policy Act. We strongly urge that the BLM make the changes we have recommended in our comments. These changes will make the RMP more balanced and defensible in terms of oil and gas considerations and decisions. A defensible plan is increasingly important in light of the successful efforts of some members of the public to halt or delay oil and gas activities on public lands.

We appreciate this opportunity to comment on the Draft EIS and RMP for the Pocatello Resource Area. If you have any questions or would like to discuss our comments in greater detail, please do not hesitate to contact me.

Sincerely,

Alice Frell Benitez
Alice Frell Benitez
Public Lands Director

AFB:cw



THE WILDERNESS SOCIETY

INTERNATIONAL REGION

May 7, 1987

Lloyd Ferguson, District Manager
Idaho Falls District, Idaho BLM
940 Lincoln Road
Idaho Falls, Idaho 83401

Re: Pocatello DRMP/DEIS

Dear Mr. Ferguson,

The Wilderness Society supports your recommendation for the three Areas of Critical Environmental Concern and the seven Research Natural Areas. The special management prescriptions will indeed help protect valuable resources if the designations remain in place, and your commitment to their primary emphasis remains strong. Departures from special management objectives even of major proportion do occur. For example, the Egin-Hamer Road decision is fundamentally contrary to ACEC management objectives for elk yet this development decision was made. These special designations are not a satisfactory substitute for wilderness designation and protection.

We do support the restoration direction within Alternative D. It is in our view the most balanced management approach in terms of stable economics and multiple-use.

We do not support the Preferred Alternative B for the management plan. Fundamental components of it are inadequate for making resource allocation decisions. The range survey data used was completed 25 years ago and does not provide a reliable picture of recent let alone current range condition or trend. The BLM is depending on "standard operating procedures and best management practices... (to) meet or exceed... water quality standards." (Page 14). And, economic impacts of non-commodity uses are not recognized. The following remarks address our objections to the Preferred Alternative.

30-1

63 WEST IDAHO STREET, SUITE 102, BOISE, IDAHO 83702
(208) 333-8153

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ECONOMICS

Economically Alt. B would result in a loss of 2 jobs which translate into an overall earnings loss of approximately \$61,000. Short-term Alt. B would cost the taxpayer approximately \$180,000 less than Alternative D. And, finally, economically Alternative B could increase the capitalized value of base ranches of those individual who lease AUMs from the public by at least as much as \$45,000 and possibly as much as \$205,000. This increase is due to the additional numbers of AUMs permitted on the public range. In contrast, Alternative D would not allow these additional AUMs and could preclude cattle access to sensitive riparian and wildlife areas. In the long-term, Alternative D would result in protection of resources the values of which have not been calculated. It is our position that improving approximately 75% more miles of stream condition, protecting over 300% more acres of ashy soils, protecting over 890% more acres of sensitive cultural areas, protecting 200 acres of woodland, gaining thousands of acres of satisfactory wildlife winter range as opposed to losing it, and increasing scenic and natural recreation opportunities in over 45,000 acres is worth these costs.

A number of important considerations are not addressed in the economic analysis including the costs of controlling noxious weeds. The invasion of many noxious weeds is due to poor condition range. Invasions would not occur into good condition native vegetation. Likewise, costs of mitigating resource degradation due to grazing and widespread ORV abuse would continue rather than taper off. In the long-term we think that resource protection for this RA will be more economically advantageous to the region rather than management as proposed under Alternative B.

WATER QUALITY

The BLM does not have the discretionary latitude to degrade water quality through activities on public land whether those activities are existing or not. Standard operating procedures and best management practices do not ensure compliance with water quality standards under the Clean Water Act; they are only means to achieve an end and do not substitute for actual measurement of water quality. What monitoring schedules, including activities, practices and mitigation measures, are in place? Monitoring of water quality would only occur every 3-5 years with an annual allocation of \$1,000 compared to a monitoring budget total of \$159,000. Monitoring for access has a budget of \$45,000 annually. This discrepancy would be ludicrous if it weren't so pathetic. What specifications will be used for

30-2

sedimentation, stream channel characteristics, water temperature, vegetation and fishery. The plan addresses the adverse impacts of sedimentation and pollution in the Portneuf River and Marsh Creek on water quality and recreational use of these two waterways. What is the monitoring framework to assure that activities under BLM purview are not contributing to this degradation? Finally, what are the thresholds for altering activities as a result of monitoring and of mitigation impacts.

RIPARIAN AREAS

30-3 A good condition riparian area is measured, according to this document, by whether or not it has a stable stream-bank. Under Alternative B only 20% of the riparian areas would be managed for improvement. This objective falls far short of the public interest.

OFF-ROAD VEHICLES

The plan confirms that under Alternative B the resource areas would continue to sustain degradation due to off-road vehicular use, and, consequently, the costs of mitigating that damage. Under Alternative D ORV use would continue on over 200,000 acres in this resource area alone. Such a huge number of acres subject to the negative impacts of ORV noise and soil disturbance is, in our view, an adequate allotment.

WILDERNESS

30-4 The proposed protection of only 11,338 acres of this resource area is shocking. As pointed out above, special discretionary management does not provide adequate protection for these natural public resources. We support the conservationists wilderness proposal for Haxel Mountain, South Samaria, Deep Creek Peaks and Petticoat Peak.

In conclusion, we do not support Alternative B for the above reasons. We request that you address our concerns with a focus on justifying to the public costs in terms of resources and dollars the management approach you select. Finally, we would specifically like to review your water quality monitoring specifications and justification for such a small water quality and riparian area monitoring budget.

Thank you for this opportunity to comment.

Sincerely,

Jane Leeson
Jane Leeson
Regional Associate



May 4, 1987

Bureau of Land Management
Idaho Falls District Office
Attn: RMP/EIS Team Leader
940 Lincoln Road
Idaho Falls, ID 83401

Dear Pocatello Area Planners,

Thank you for your quick response to our request for a copy of your Draft Resource Management Plan which was included in our letter of April 22, 1987 (addressed to Pocatello Resource Area Manager, 250 South 4th Ave, Pocatello, ID.). As outlined in that letter, American Rivers is initiating a review of BLM Draft RMP's with respect to their consideration of potential Wild and Scenic Rivers as required of all federal agencies under the provisions of the Wild and Scenic Rivers Act, P.L.N. 90-542, 16 U.S.C. Sec. 1276(d). I am enclosing a copy of that letter, which outlined the BLM's planning responsibility under the provisions of the Act and outlined the procedure for consideration of potential Wild and Scenic River areas in the planning process as stipulated by the USDA/USDI Interagency Guidelines of September 7, 1982.

The Nationwide Rivers Inventory (NRI), begun by the Department of the Interior's Heritage Conservation and Recreation Service and completed by the National Park Service in 1982, establishes a comprehensive initial listing of rivers which are both free-flowing and exhibit the requisite one or more outstandingly remarkable values. NRI rivers are thus presumptively eligible for further consideration as potential wild and scenic rivers.

The Blackfoot River is one of the three major rivers noted to be within the boundaries of the Pocatello Resource Management Area. A 32 mile segment of the Blackfoot, from its source to its confluence with Blackfoot Reservoir, is listed in the NRI as exhibiting outstandingly remarkable fish and scenic values, which are elaborated upon in the following way: "Relatively low flow, tightly meandering river flowing in sparsely vegetated area. Broad scenic valley provides expansive vistas. Good fishing stream--jointly designated by US Fish and Wildlife Service, EPA and Idaho Fish and Game as a 'highest - valued Fishery Resource'." This entire 32 mile segment of the Blackfoot River lies within the Pocatello RMA.

31-1 We request that the Pocatello Planners include in the Final RMP eligibility and classification analyses consistent with the USDA/USDI Guidelines for the NRI listed segment of the Blackfoot, as well as for other potentially eligible river segments which might include the remaining reaches of the Blackfoot River, the Portneuf River, the Bear River, Marsh Creek, Petticoat Cr. (WSA), Worm Cr. (WSA) or any rivers deemed appropriate in the professional opinion of

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SUITE 505
WASHINGTON, D.C. 20003
202-547-6900

the Planners. Eligible river segments should be classified and placed within special Wild and Scenic Management Corridors which protect the segments up to the levels of their classification, and which reflect the specific protections provided classified segments in the USDA/USDI Guidelines.

Thank you for your cooperation, we would be pleased to receive any comments or questions you may have.

Sincerely,
Kevin J. Coyle
Kevin J. Coyle
Director of River Protection

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101



REPLY TO
ATTN OF WD-136

APR 30 1987

Lloyd H. Ferguson
District Manager
Idaho Falls District
Bureau of Land Management
940 Lincoln Road
Idaho Falls, Idaho 83401

Dear Mr. Ferguson:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act we have reviewed the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Pocatello Resource Area (PRA). The PRA encompasses 264,481 acres spread across seven counties in Southeastern Idaho.

Based on our review we have rated the EIS EC-2 (Environmental Concerns - Insufficient Information). We have concerns on how Best Management Practices (BMPs) will be implemented and the water quality and fisheries effects from management practices. The enclosed report details our concerns and comments.

Thank you for the opportunity to comment on this EIS. Should you have any questions about our comments, please contact Wayne Elson at (206) 442-2463.

Sincerely,

Robert S. Burd
Robert S. Burd
Director, Water Division

cc: John Wolfelin, FWS
Dave Hanson, IDFG
Steve Bauer, IHW

Enclosure

33-5 It is our belief from literature review and discussions with riparian experts that a 30 percent utilization standard would be more appropriate for key riparian plans than the 50 percent you propose. You need to justify your decision to use the 50 percent utilization standard. Fifty percent might be acceptable in intensively managed double-rest rotation grazing systems. But, this is not the kind of grazing system you are proposing. We also note that there are no provisions in the plan for moving livestock once 50 percent utilization is reached. With the minimal monitoring you have proposed and no proposal for what to do once utilization is reached, we believe your utilization standards will serve little purpose in actual on-the-ground decisions.

The R-1 classification system you propose to use was designed primarily for stream channel stability rating, not to rate riparian habitat. A much better technique for addressing fish production needs would be the GAMS Inventory Method as modified and used by the Caribou National Forest.

Because riparian habitat is the focal point of livestock activity and the most critical habitat type in your allotments, we believe that riparian monitoring should clearly take precedence over rangeland monitoring. We submit that the condition of riparian habitat will be a much better measure of the overall condition of allotment than will the condition of the upland rangeland types.

II. Wildlife

We suggest you add a criterion on page 12 that mandates special treatment on critical habitats and riparian areas. We also recommend that you recognize that ORV, or all vehicle use, can reduce habitat effectiveness for wildlife and eliminate security areas.

33-6 We are concerned about the loss of upland habitat that your preferred alternative indicates. You propose 1,730 acres of sage and sharp-tailed grouse habitat for land disposals, 2,380 acres of sage grouse habitat for brush control, etc. We suspect that much of the remaining 8,860 acres of brush control is sharp-tailed habitat, although it was not identified as such.

33-7 Before any burning is conducted, base line data are needed to determine the presence of sharp-tailed grouse, especially dancing grounds. On page 53, the sharp-tailed grouse should be included in the list of IOFG's Species of Special Concern.

33-8 The future demand for hunting is not addressed in the decision-making process (page 3-23). You do not specify what criteria were used to determine whether a piece of habitat was satisfactory or unsatisfactory for big game or grouse (page 5-9). Why was no aspen management proposal included in Alternative 0?

33-9 We note several good items in your standard operating procedures. However, we are concerned by a statement on page 52 that "During any given year, the authorized officer may waive or adjust seasonal wildlife restrictions if actual conditions warrant." We would like to know what criteria will be used to decide when conditions warrant or if criteria exist. We also believe strongly that other interests should be consulted before any waiver is issued.

III. Fisheries

33-10 We find the fisheries section of your plan to be weaker than the wildlife section. Little concern is expressed throughout the plan regarding fisheries concerns. Neither the fine-spotted nor Yellowstone cutthroat trout, both species of special concern, are mentioned in the plan. Nor was the projected demand for fishing made a part of the decision-making process for choosing among alternatives (page 34).

33-11 You state that "Forage and cover requirements will be incorporated into the allotment management plan and will apply to specific areas of primary wildlife use." Requirements for fish also must be addressed in these AMP's.

33-12 We have already expressed our concerns about riparian management. We would reiterate that riparian protection along with erosion (i.e., sedimentation) is a major concern for fisheries. The triggering erosion mechanism of 5 tons/acre which you propose before control measures are implemented is not acceptable. We suggest that 2 tons/acre would be much more appropriate. We base this suggestion on the fact that SCS (1984, Idaho's Soil and Water: Condition and Trend) shows an average erosion rate on pasture and rangeland of 1.2 tons/acre per year. Allowing 2 tons/acre per year would be a substantial increase over the average and we believe this is more than generous.

IV. Economics

33-13 Economics of wildlife and fisheries does not appear to be viewed in the same light as that of range. Eg., the rationale under range labels livestock grazing as "...an important economic resource. . ." (page 37) whereas, under wildlife, the rationale does not mention economics (page 38).

We mentioned above that the economic values you used are low and could considerably change the economic analysis in your plan. We are not sure whether small game hunting was included in your analysis. Failure to use a multiplier for nonresident expenditures would also depress the values you present. We have data on the proportion of hunters who are nonresidents. Lou Nelson of our Boise office (334-2920) will be glad to discuss these estimates with you or provide you with references and published information.

As an example of our concern over your economic analysis, we would submit the following as our impression after reviewing page 2-29. It seems strange to us that direct and secondary income generated under the preferred alternative is higher than that for the "maximum production" alternative and is so close to that projected for the "protection" alternative. This would indicate that your economic analysis is either biased, not sensitive, or that the range of alternatives is narrow.

V. Range

We suggest that the criteria on page 11 be reordered by moving #1 into the third position.

33-14 We note that the best alternative for range condition is 0. In this alternative, you state that "Grazing increases resulting from range improvements would occur only if long-term monitoring indicates it to be prudent." We believe that this principle should be applied to all alternatives, not just alternative D. Why was it not applied to other alternatives?

33-15 Your preferred alternative proposes a decrease in the land base, an increase in grazing, and better protection for the riparian habitats. We do not believe this is possible considering our concerns over inadequacy of monitoring. Money and manpower is not adequate to provide the management necessary to keep livestock away from the riparian zones, even without an increase in AUMs. We would also like to see a schedule in the final plan for funding, including expected gains in AUMs and expected improvement in riparian habitat.

33-16 To properly monitor all 415 allotments, manpower and money needs would have to expand considerably above what you propose. We noted that range condition was last evaluated in 1977 and 1978, with a follow up ecological site index on some tracts in 1984. Any attempt to improve habitat or to improve the situation will require substantially more monitoring than this would demonstrate. To complicate what we see as a shortage of manpower and time to do the job you have proposed, the plan also calls for 8 allotment management plans to be written each year over the next 15 years. This task alone would seem to put such a demand on your time that monitoring will suffer even more.

VI. Timber

33-17 Our main concern here is that standard operating procedures need to be identified to guide harvest. We submit that these should include, although not be restricted to, the following:

1. Clearcuts should not exceed 40 acres in size.
2. Tractor skidding should not be allowed on slopes of greater than 45 percent.
3. Tractor skidding should not be permitted in riparian areas and crossings should occur only at right angles.
4. A snag retention policy (we suggest 10 snags per acre) should be included.
5. Buffer strips of 100 or more yards should be specified between adjacent clearcuts.
6. We support your proposal of a 200 foot buffer strip surrounding all wet areas.
7. We support your proposal of slash piles of less than one and one-half feet.

VII. Alternatives

Evaluating the Preferred Alternative is somewhat difficult because you have selected 8 for all resources except range, where A was selected. We are not convinced that the impacts of this combined alternative can be clearly understood.

33-18 There are few differences among the alternatives in the range section. You present a current condition, then increases of 19 percent (protection), 30 percent (preferred and mineral), and 35 percent (maximum). Since you do not indicate generally excellent range condition, we believe a more appropriate range of alternatives would be -25 percent, -10 percent, status quo, +10 percent, and +25 percent. This would allow a true evaluation of what could be gained, not only by increasing livestock production, but also by decreasing it.

Your plan obviously lacks a recreation alternative. Using your own figures, big game hunting, fishing, and miscellaneous recreation contributed 1.6 million dollars to the local economy. This is slightly more than grazing. Was small game hunting included in these estimates? If not, the value of recreation would be even higher. As explained under "Economics," you included only direct expenditures and not all the indirect expenditures for equipment, etc. We will not belabor the point, but would simply summarize by saying that recreation is an important resource that you have not given adequate attention to.

It is not clear how you selected the preferred alternative. We believe you should clearly state, for the benefit of reviewers and your clients, exactly how the selection was made.

VIII. Land Exchanges

It appears that the only consideration in deciding which parcels to offer for sale or exchange was whether the tracts were isolated or not. Although we recognize the difficulty of managing isolated parcels of land, we believe that there are more important considerations to whether or not land should remain in public ownership. There are other alternatives for managing these lands. We are not opposed to the idea of land trades, sale or exchange per say, but rather object to your apparent method of deciding which parcels to dispose of.

33-19

All alternatives you propose offer parcels of big game winter range, important sharp-tailed grouse habitat, and riparian areas for disposal. This contradicts your statement that you plan to "...retain tracts that have high wildlife values." (page 36). We feel it is your responsibility to maintain these important habitats for their values to the fish and wildlife resource. Your charge for management, under Federal requirements, provides better assurance of appropriate management for these wildlife habitats than would management either by the state or private interest. We urge you to reconsider the criteria you have used to select lands for disposal.

33-20

IX. Miscellaneous

We believe that multiple resource use objectives should be developed for all lands, not just lands in the "Improved" category. In particular, they should be developed for lands in the "maintain" category.

We would encourage the BLM to develop a joint travel management map with the Caribou National Forest. We would also encourage the BLM to actively pursue an access acquisition program to provide recreational access to currently isolated portions of BLM land.

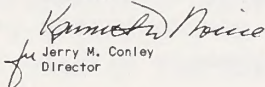
The amount of change necessary to warrant a decision change (Appendix H) is excessive in several cases.

X. Summary

In summary, we find the document to be generally good. Our main concerns relate to inadequate treatment and protection for riparian areas, inadequate monitoring, superficial treatment of fisheries issues, and an inadequate range of alternatives.

We thank you for this opportunity to comment on the plan. If we can assist you in any way in improving the final version, please let us know.

Sincerely,


Jerry M. Conley
Director

JMC:CHN:tlv

cc: Lou Nelson
IDFG Region 5

LETTER RESPONSES

- 1-1 We have reviewed the Cottonwood Block and have found that the exchange, as now proposed, would not meet the public interest criteria established by Section 206 of FLPMA. We have therefore not changed the preferred alternative which identifies the lands for retention.
- We will continue to discuss and cooperate with you on possible exchanges. If, at some time in the future, the public interest criteria of FLPMA can be met, we will consider amending the plan which will include full public participation.
- 2-1 The lands you refer to in your comment letter (Cottonwood Block) have not been identified for disposal in the preferred Alternative (Alternative B).
- 3-1 Signs would be posted at Formation Springs to help enforce the ORV closure for the area. The Idaho Falls District Office is also in the process of hiring a fulltime BLM Ranger to help enforce public land designation. Interpretive signs will be considered as time and money become available.
- 6-1 This information is found elsewhere in the Draft RMP/EIS document. Please refer to Table 4.1, page 4-4. Mineral potential (low, moderate, high) is tabulated for each of the mineral types.
- 6-2 This has already been done in the Draft RMP/EIS document. In Part II, Chapter 4, the minerals alternatives (A, B, C, D, and E) are given in both acreage and percent. Also, Table 4.1 compares mineral potential to mineral availability.
- 8-1 The Pocatello RMP/EIS document will be used as a basis for making oil and gas leasing decisions. Leasing decisions will not be subject to additional environmental documentation or public scoping. Post-lease development proposals will be subject to additional NEPA documentation.
- 8-2 Areas have been identified where there are conflicts between mineral development and other resources. The RMP/EIS will be used in making fluid leasable decisions. Additional environmental documentation will be done prior to actual approval of a drilling proposal.
- 8-3 The RMP/EIS document deals primarily with availability of lands for mineral exploration, leasing, and development. It does not focus on site specific projects, or impacts of these projects. Mitigating measures (NSO, Cultural Clearances, etc.) are discussed in the Draft document and will be brought forward on site specific projects.
- 8-4 A discussion of oil and gas exploration, leasing, production, and abandonment stages has been added to Appendix G (see back of this document for Appendix G).
- 8-5 Please refer to Maps B3 and B4 at the back of this document.

- 8-6 Please refer to Maps B3 and B4 at the back of this document.
- 8-7 The low potential areas shown on Map 10, page 3-6 of the Draft RMP/EIS, are areas with few geological characteristics for oil and gas potential. These areas were rated by industry as unknown potential. We agree that these low or unknown potential areas may be found to have the highest potential as exploration continues. However, these classifications will not affect the availability of these lands for fluid minerals leasing. Classifications are only used to try and show reasonable impacts.
- 9-1 You are correct in that your allotment does not drain into the Downey watershed but, according to the legal description attached to the Downey watershed withdrawal (Executive Order dated December 29, 1919), a portion of your allotment is included in the description. The reason your allotment was given an "I", or improved, category designation was due to the proximity to the drainage. Cattle may move into the drainage area impacting the springs associated with the watershed. Allotments identified as "I" are scheduled to receive funding so improvements can be made to alleviate any possible impacts that could occur to the watershed.
- 12-1 The Bureau in Idaho has not designated utility corridors since 1981 in Land Use plans, primarily because we found it impossible to coordinate all government agencies and utilities both within the State and adjoining states in a timely fashion. We are considering doing a statewide corridor plan in the near future.
- 12-2 We feel they are adequately covered in the Draft document. Please refer to pages 23 and 45. Map B2, at the back of this document, also illustrates these areas.
- 12-3 The geothermal sites identified in BPA's 1985 Resource Assessment/EIS were covered on page 3-7 (Part II, Chap. 3). For example, the Blackfoot Lava Field is referred to as the Soda Springs/Blackfoot Reservoir Area and the four sites in Franklin County are referred to as the Preston/Cleveland Area. The statement is also made in the RMP/EIS that geothermal exploration wells were recently drilled in these two areas. No conflicts were identified between geothermal exploration or development and proposed land use restrictions.
- 19-1 See response to 8-4. An outline showing the various stages of oil and gas exploration, leasing, production and abandonment has been added to Appendix G.
- 19-2 See response to 8-1 and 8-2. The conflicts affecting mineral leasing have been identified and are discussed in this Draft RMP/EIS document.
- 19-3 We agree, areas listed as closed to fluid mineral leasing do not need NSO stipulations. This has been corrected and a new map prepared. Please refer to Maps B3 and B4.
- 19-4 Refer to responses 8-5 and 8-6.

- 19-5 Refer to response 8-7.
- 21-1 Your statement "neither man nor his environment are static entities" is very true. The validity of any planning document lies in its ability to incorporate new information. We believe through monitoring and plan maintenance we will be able to achieve this goal.
- 21-2 As identified on page 61 of the Draft RMP/EIS, we also see the need for a continued program in cadastral survey. Survey requirements and priorities are determined on a yearly basis as part of the annual work planning process (budget needs). If you have identified areas needing survey, please let the Pocatello Resource Area office know; this will help us prioritize surveys in the future.
- 23-1 Recharge to the ground water flow system feeding Formation Springs is believed to occur primarily in the interior valleys between the Aspen Range and the Webster Range (Ralston, August 1984). The 340 acres managed by the BLM lying east of Formation Springs is not a recharge area for the Springs. The only concern associated with the 340 acre parcel is possible surface water contamination that may enter the creek downstream from the Springs (point of diversion for city water supply). Some grazing occurs on this 340 acres at present, but these grazed acres do not drain into Formation Springs. The grazing that does occur on the 340 acres (BLM) is approximately 1/4 of a mile from the Spring and Creek.
- Mineral potential for the 340 acres is low to nonexistent and, as a result, no mineral activity is expected to occur on the 340 acre parcel in the future.
- As a result of the above described information, the BLM feels that a special designation for the 340 acres is not warranted. We do, on the other hand, feel it necessary to work closely with the City of Soda Springs and other interested parties on any future ground disturbing activity associated with the 340 acre parcel, if and when such activity is presented.
- If at any time in the future an activity or development is proposed on the BLM administered 340 acre parcel east of Formation Springs, the BLM will coordinate the analysis of the proposal with the City of Soda Springs.
- 23-2 All public lands which fall within the critical habitat designation (May 15, 1978) are treated as such and are managed so their use is not detrimental to cranes. Lands outside the designated area are managed for multiple use with consideration for cranes in mind. Please refer to pages 3-21 and 3-22 of the Draft RMP/EIS.
- 24-1 Refer to response 23-1.
- 25-1 Our intention is to obtain legal access to the Moonlight Mountain area. The BLM will maintain the existing road in its primitive condition with an ORV designation of, "Open to wheeled vehicles in the summer months, closed in the winter months including snowmobiles".

- 26-1 Map 16 in the Draft RMP/EIS shows that we propose to limit ORV and snowmobile use in areas you described in your comment letter.
- 28-1 The statement "BLM will manage cultural resources so that representative samples of the full array of scientific and socio-cultural values are maintained" should not be viewed as contradictory, or as an abdication of BLM's cultural resource management responsibilities. It is, instead, a commitment to cultural resource protection. The concept of preserving a representative sample of scientific and socio-cultural values recognizes the reality that it may not be possible to preserve every cultural resource site or locality in its original form or setting. Site elements will be lost through natural deterioration, and through vandalism. It may also be necessary, due to inevitable natural resource use conflicts and pressures, some sites will require removal by salvage excavation or dismantling (structures and buildings) from public lands. BLM will continue to stress protection and management of cultural resources.
- 28-2 During the writing of the draft plan, a scoping session with all resource area staff, was held to determine legal and physical access needs. Impacts to all resources was discussed as well as type of access needed, i.e. vehicle, foot, etc. All but one of the needed accesses uses existing roads or vehicle trails. The Blackfoot River Narrows is the one exception. Refer to revised Table 4 for more information and clarification.
- 28-3 Before any action is taken to develop these two recreation sites, a site-specific environmental analysis will be prepared. The analysis would be coordinated with the Shoshone-Bannock Tribe to assure that all the concerns presented are covered sufficiently.
- 28-4 Resource Management Plans were not designed to cover all site specific impacts generated as a result of a decision. For example: the RMP presents a decision to develop a campground. The EIS portion of the document covers the effects of developing this campground in general terms, highlighting the overall impacts. After the RMP/EIS is approved and before any ground disturbing activities start, an environmental analysis (EA) would be developed. This EA would be a site-specific document covering exactly what would occur to the surrounding environment if the campground was built. This level of detail is not necessary or desired for Resource Management Plans.
- 28-5 While we can agree with your first two sentences, the Idaho Falls District is in the process of hiring a fulltime enforcement officer. Currently, there are no restrictions on snowmobiles on most winter ranges. Given past complaints and closure requests by the public, we feel that what we have proposed is reasonable to protect the resource.
- 28-6 Satisfactory and unsatisfactory classifications resulted from the ecological condition inventories conducted from 1984 to 1985. Generally, those areas in excellent or good condition were

satisfactory and those in fair or poor condition were unsatisfactory. These classifications varried by alternative depending on the amount of wildlife habitat affected.

28-7 On page 25 of the Draft RMP/EIS, 17,068 acres were identified as the total acres of public land that may leave public ownership through either sale, exchange or R&PP. In an exchange, tracts identified for disposal will leave public ownership, but we would obtain other land in exchange.

The acreage figure identified for State exchange on page 36 of the Draft RMP/EIS (15,720) should be changed to 9,880 acres.

Acquisition of private and State lands as a result of exchanges would be done to support wildlife, recreation, and other resource programs. We do not know what lands will be offered for exchange until a proposal is presented. When a proposal is presented, we will prepare an Environmental Analysis and an appraisal. Please refer to page 44 in the Draft RMP/EIS for a description of the exchange criteria.

28-8 The statement on page 3-16, second paragraph in the Draft RMP/EIS, is incorrect.

"A total of 97.44 miles, or 75 percent, of the riparian habitat in the PRA was inventoried in this planning effort". "of the streamside riparian habitat inventoried, 1.15 miles, or 1 percent, are in excellent condition, 55.30 miles, or 57 percent, are in good condition, 34.74 miles, or 36 percent are in fair condition and 6.25 miles, or 6 percent, is in poor condition. A total of 34.15 miles of the riparian habitat inventoried, or 35 percent, has the potential to be improved through BLM management actions. Other riparian habitat is either in good condition with no change in management required or is affected by land practices upstream over which the BLM has no control".

Four allotments, identified for more intensive management in the Draft document, were missed when the riparian calculations were done. As a result of incorporating these four additional allotments, the miles of stream, which would deteriorate in condition, reduced to 1.40 miles and miles of stream that would be managed to improve riparian habitat increased to 22.70 miles. A total of 70.89 miles of riparian habitat would be managed to maintain their existing riparian values. These additions are 0.25 miles of Turner Canal in allotment #4117, a tributary to Crow Creek that is 0.30 miles in length in allotment #4269, 0.80 miles of Jones Creek in allotment #4423 and 1.20 miles of Wolverine Creek in allotment #4094. This will require an additional 1.50 miles of fencing and would mean BLM is going to improve 66 percent of the riparian habitat with potential to be improved through BLM management actions.

Approximately 19.37 miles of fishery streams, or 37 percent of fishery streams inventoried, would be expected to improve; 0.25 miles would continue to deteriorate and 32.97 miles would remain unchanged.

We feel that improving 66 percent of the riparian habitat inventoried with potential to be improved through management actions represents an ambitious, but still realistic, goal considering current funding available to carry out these projects.

28-9 The Resource Area's allowable cut will average around 0.3 million board feet per year. The figure of 0.4 million on page 34 was a misprint.

28-10 In the draft document on page 37, the 2nd paragraph under Range Management, we made the following statement: Seedings would be done in areas where a native perennial seed source is not available.

You indicated in your letter that an adapted native seed mix of grass, forbs and shrubs should be used and that the use of exotics such as crested wheatgrass no longer have a place in balanced resource management.

Prior to seeding any area, the project would be staffed out. This would involve an environmental analysis. A suggested seed mixture would be recommended. Every effort would be made to seed areas to native seed mixtures; however, in some instances the seed is simply not available or is far too costly. In these cases management must make the decision whether to use crested wheatgrass or a strain of crested wheatgrass or maybe another exotic. We do not foresee areas where the exclusive use of crested would be used but it could be a component of the seed mixture.

28-11 On page 45 of the Draft RMP/EIS, Land Use Authorization, the key word here is "interim" management measure. When an unauthorized agricultural use case is resolved in the spring and damages paid, we will authorize the use for the growing season and require reseeding (restoration) in the fall after harvest. Also, if the tract is identified for disposal, we will use the land use permit as "interim" use until the disposal action is completed. At this time, there are only 181 acres of agricultural land under land use permit, with 25 of the 181 acres being restored this fall (1987).

28-12 While it was not stated on page 53, the Idaho Fish and Game Department is consulted on animal control programs and is part of an annual four agency coordination meeting.

28-13 Refer to response 28-10.

28-14 Your concern, as stated, is a very real one. As you know, it is always difficult to enforce the designations and/or restrictions attached to large or dispersed geographical areas. We feel we are going to alleviate the majority of this concern by hiring a fulltime BLM Ranger to handle law enforcement problems on public lands within the Idaho Falls District.

28-15 While the Criteria listed on page 43 are the values to be "considered", it is our opinion they do not necessarily prohibit exchanges or sales from occurring. Section 206 of FLPMA requires that exchanges be in the public's interest.

- 28-16 Most of the areas you referred to on page 4-36 of the Draft RMP/EIS would be disposed of through exchange where we receive lands that are equal or greater in value. Each case is evaluated individually through an EA/Land Report.
- 28-17 "Access would be a key consideration in all land transfers. Parcels essential to assure public access to BLM administered public lands would be retained" (refer to page 36, Draft RMP/EIS). Parcels without legal access become inaccessible for public or Tribe uses. The majority of the parcels identified for disposal do not have legal access. Disposals through exchange may provide benefits to the off-Reservation rights.
- 28-18 On pages 44 and 45 of the Draft RMP/EIS under Sales it states: "Public land to be sold must meet one or more of the following criteria derived from Section 203(a) of FLPMA". Your comment only covered one of the 3 criteria listed.
- 28-19 We agree and this is SOP, see page 51 and 53 of the Pocatello RMP/EIS Draft document.
- 28-20 There is a need to explain what is meant by "a balanced approach to natural resource management....". The reviewer has correctly assumed that a balanced approach to natural resource management would be one that gave cultural resources the same consideration as other public land resource values (i.e. range, ORV use, wildlife).

Potential conflicts would be resolved by moving the impacting agent, or use (i.e. timber sale, range improvement) to another, less sensitive location.
- 28-21 BLM Manual Section H-3131-1 outlines the standard steps and procedures of cultural resource management plan preparation. It stipulates that early in the CRMP process, individuals and groups should be identified who should be consulted and/or involved in the plan's preparation, input, review, and approval. In the preparation of any Pocatello RMP/EIS derived cultural resource management plan, the Shoshone-Bannock tribes would be included on the list of individuals and groups requiring close contact and coordination.
- 29-1 The Draft RMP/EIS document proposes that only minimum legal standards, that is standard stipulations, be applied to fluid leasing under Alternatives C and E. The minerals alternative, Alternate E, does not propose the addition of 3514 acres of discretionary closures but actually opens 7000 acres of the protective buffer zone at Grays Lake National Wildlife Refuge to leasing with NSO stipulations. Only 4000 acres of the 7000 acres would have NSO stipulations attached. The 914 acre Fawn Mountain State Park remains closed to leasing.

The alternatives do not vary in acres significantly since there are few proposed discretionary closures; however, other restrictions vary considerably by alternatives. Alternative E does permit industry to determine maximum available opportunities for leasing and development.

- 29-2 Refer to responses 8-5 and 8-6. Under Alternative B (preferred alternative), ACECs and RNAs are open to oil and gas leasing with NSO stipulations, but are closed to phosphate leasing.
- 29-3 Refer to response 8-2.
- 29-4 Refer to response 8-2.
- 29-5 Refer to response 8-3.
- 29-6 Refer to response 8-4.
- 29-7 Refer to responses 8-5 and 8-6.
- 29-8 and
29-9 Refer to response 8-7.
- 30-1 Please refer to page A-6 in the Appendix of the Draft RMP/EIS. During the 1984 and 1985 field season, a vegetative inventory was conducted. The inventory gathered information on range site classifications, present vegetation, ecological condition, and apparent trend. It was our best effort and, in our opinion, this inventory does provide a reliable picture of current range condition and trend.
- 30-2 The Bureau of Land Management tries to maintain water quality so as not to impact beneficial uses of water such as fisheries, drinking water and recreation. This is done through the use of standard operating procedures and best management practices. Water quality monitoring will be conducted to check compliance and effectiveness of these practices and procedures and they will be refined and modified to assure their effectiveness.
- The scattered land pattern of the Pocatello Resource Area makes it difficult if not impossible to compare water quality measurements to the effects of land management activities on public lands. The current budget of the soil, water and air subactivity does not allow for a greater expenditure of funds for water quality monitoring than is identified in the resource monitoring and evaluation. Also, if you take into account all the supporting activities such as range, wildlife, forestry, recreation, etc., the budget for water quality/riparian is fairly substantial. Each one of these monitoring activities will provide information on riparian habitat and water quality conditions (Table H, pg. H-7).
- It is felt that by improving 66 percent of the riparian habitat inventoried with the potential to be improved through BLM management actions, a significant improvement in water quality will occur.
- When an action is proposed, such as a timber sale or phosphate mining operation, an environmental assessment is prepared which explains the proposed action. Standard operating procedures (SOPs) and best management practices (BMPs) developed through past experience are required to protect resource values and are included in the proposed action. Additional mitigating measures are selected by the resource specialist responsible for that specific subactivity.

During inspections, BLM personnel monitor whether SOPs and BMPs are implemented as prescribed and are working as intended.

Overall riparian habitat condition will be thoroughly evaluated every three to five years. If a stream segment exhibits a downward trend or changes in condition downwards, then action will be taken to improve that situation through stipulations or conditions imposed on BLM leases, licenses and permits.

30-3 "The factors analyzed in determining riparian habitat condition were riparian vegetation, water quality, and streambank and channel stability.

Water quality parameters measured were pH, alkalinity, carbon dioxide, acidity, conductivity, and temperature. Water quality on those streams inventoried was generally good (61 percent) to fair (35 percent). Streambank and channel stability was also good (71 percent) to fair (24 percent). This was calculated using the stream reach inventory and channel stability evaluation (R-1 USFS). Riparian vegetation was rated good (57 percent) to fair (36 percent). (See Appendix C for further information)". See page 3-37 of the Draft RMP/EIS.

Riparian vegetation condition was based upon density, condition and diversity of the vegetation. "A total of 34.15 miles of riparian habitat inventoried, or 35 percent, has the potential to be improved through BLM management actions. Other riparian habitat is either in good condition with no change in management required or is affected by land practices upstream over which the BLM has no control" (see page 3-36 of the Draft RMP/EIS).

Under Alternative B, the preferred Alternative, "A total of 22.70 miles of stream would be managed to improve riparian habitat. These streams have a potential to be improved through BLM management actions and represent 66 percent of the miles of riparian habitat with potential to be improved. This would include constructing 9.75 miles of fence and limiting utilization on key riparian vegetative species to 50 percent" (see page 4-36 of the Draft RMP/EIS).

We feel that improving 66 percent of the riparian habitat inventoried with potential to be improved through management actions represents an ambitious, but still realistic, goal considering current funds available to carry out these projects. Also see response 28-8.

30-4 The Pocatello Draft RMP/EIS did not evaluate wilderness suitability. Please refer to pages 1, 2, and 27 of the Draft RMP/EIS for further explanations.

31-1 Before we prepared the Draft RMP/EIS, we did review the Nationwide Rivers Inventory (NRI) list of potentially eligible Wild and Scenic River segments. The 32 mile segment of the Blackfoot River (from its source to its confluence with Blackfoot Reservoir), identified in your comment letter, does not maintain any significant BLM-administered lands along its banks. We have two 40-acre parcels

(T. 7 S., R. 42 E.) but that's the extent along the upper corridor. Lands adjoining this portion of the Blackfoot include 2.2 miles of Caribou National Forest land with the rest private.

Thirty four miles of the Lower Blackfoot include adjacent BLM-administered lands that could be considered eligible for Wild and Scenic Study. A Wild and Scenic Analysis was not done for this segment because it was not identified as an issue during the RMP scoping process, was not listed on the NRI, and the authority to conduct Wild and Scenic River Studies for the Department of the Interior rests with the National Park Service. However, because the American Rivers Organization has prompted BLM to take a more active role in Wild and Scenic River considerations in the land use planning process, procedures are currently being developed to incorporate Wild and Scenic Evaluations in RMPs. These draft procedures include steps to evaluate rivers that were not originally covered in recent and on-going plans, such as the Blackfoot. The steps include a plan amendment for a separate Wild and Scenic Study which could be appropriate for the Blackfoot and could include the 32-mile Upper Blackfoot as a coordinated effort with other adjacent landowners. This approach would provide a more efficient analysis and study for the entire Blackfoot River.

In the interim, the management prescriptions in the Pocatello RMP call for protection of natural, recreation and watershed values along the Lower Blackfoot. These prescriptions are consistent with maintaining the highest classification anticipated for the Blackfoot, which is scenic.

The other river segments mentioned in your comment letter (Bear River, Marsh Creek, Petticoat Creek, and Worm Creek) either maintain no public lands along their banks or, in our opinion, are not deemed appropriate for Wild and Scenic Study.

32-1 On page 1, paragraph 2 (Draft document) "Alternative B is the preferred alternative" and is not a combination of alternative A and B. Alternative A includes the proposed action for the range management program (as required by BLM Policy) but is not the preferred alternative for range.

32-2 When an action is proposed, such as a timber sale or phosphate mining operation, an environmental assessment is developed which explains the proposed action. Standard operating procedures (SOPs) and best management practices (BMPs) developed through past experience are required to protect resource values and are included in the proposed action. Additional mitigating measures are selected by the resource specialist responsible for that specific subactivity (i.e. District Hydrologist is responsible for water quality).

The party granted permission to carry out a specific activity is responsible for implementing the BMPs. If a BMP is not providing the water quality protection intended, then the responsible party is required to take additional measures as judged necessary by the BLM to protect water quality.

During inspections BLM personnel monitor whether BMPs are implemented as prescribed and are working as intended.

To avoid long-term and short-term adverse impacts to wetland-riparian areas and degradation of water quality, stipulations or conditions will be imposed on BLM leases, licenses and permits. Monitoring will be conducted to check compliance and effectiveness of these stipulations and conditions as well as that of BMPs and SOPs.

32-3 When monitoring shows that SOPs are not providing the water quality protection intended, the SOP will be modified on a case specific basis so that water quality is adequately protected.

32-4 Of the 97.44 miles of stream inventoried, 52.57 miles contain game fish. As a result of incorporating four "I" category allotments that were missed when first calculated, now approximately 19.35 miles of fishery stream, or 37 percent of the fishery streams inventoried, would be managed to improve riparian habitat condition. This would be done through fencing and more intensive livestock management. There would be 0.25 miles of fisheries streams that would continue to deteriorate and 32.97 would remain unchanged.

32-5 It was an oversight to not recognize the fine spotted and Yellowstone cutthroat as fish species of special concern. Fisheries habitat for cutthroat trout will improve along with improvement in riparian habitat conditions on 15.55 miles of streams in the preferred alternative.

32-6 "The factors analyzed in determining riparian habitat were riparian vegetation, water quality and streambank and channel stability".

Water quality parameters measured were pH, alkalinity, carbon dioxide, acidity, conductivity, temperature and dissolved oxygen. Water quality on those streams inventoried was judged to be good (61 percent) to fair (35 percent).

Streambank and channel stability was also good (71 percent) to fair (24 percent). This was calculated using the stream reach inventory and channel stability evaluation (R-1 USFS). This rating is a point count where 38 = Excellent, 39-76 = Good, 77-114 = Fair, 115+ = Poor. This channel rating was done on each 1/4 mile stream reach or where there was a change in stream condition.

"Riparian vegetation was rated good (57 percent) to fair (31 percent)". Estimation of riparian vegetation condition was based upon density, condition, diversity of the vegetation, grazing impacts, % utilization, and new willow growth. Riparian vegetation was given a general rating by 1/4 mile reaches. Wildlife sightings were also noted. Riparian vegetation was judged for trend including the percentage of man caused impacts.

Erosion was also inventoried. Sensitive soils were noted, as was texture. Headcuts and rill and gully erosion were observed.

Sediment transport was noted by natural versus accelerated types. Erosion trend was estimated.

Mining, logging, road construction, ORV use, recreational use, and trespass land use were noted along stream reaches.

All of the above were analyzed and contributed to the determination of an overall riparian habitat condition rating.

Fisheries habitat was also inventoried. Pool-riffle ratio, pool class, cover, shade, spawning gravels and migration restrictions were noted for each stream segment inventoried. Fisheries potential, numbers of fish, species, size and fishing use were also observed.

32-7 The greatest single factor that affects soil erosion is the degree or steepness of slope. Where slopes are flat or gentle on rangeland, soil erosion measurement is very small as long as vegetation remains at the soil surface. As slopes become steeper than 30 percent, natural geologic sheet and rill erosion alone can approach 5 tons per acre per year without any other man or livestock caused influence. The Draft Pocatello RMP/EIS states that when measured upland sheet and rill erosion (whether natural geologic and/or man caused) is measured at 5 tons per acre per year, management action will be taken to remove the man caused influence. Generally speaking, cattle don't like to graze on steep slopes and will do so only if there is little feed left on the bottom lands. If this occurs, it is time for them to be moved to the next pasture.

Allotment leasing excludes leasing of rangeland on steep slopes. Please see response 33-12 for more information.

32-8 Under each of the alternatives there are parcels of public land which contain riparian habitat that are proposed for disposal through sales, exchanges, or the Recreation and Public Purposes Act. All land exchanges or land disposals involving riparian habitat, wetlands and floodplains will be conducted in accordance with Executive Order 11988 and Executive Order 11990. Executive Order 11988 directs BLM to take action to avoid, to the extent possible, long and short term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct and indirect support of floodplain development whenever there is a practicable alternative. Executive Order 11990 directs the BLM to take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial value of wetlands in carrying out programs affecting land use, which may include constraining or excluding those uses that cause significant, long term ecological damage.

To meet these objectives, the Executive Orders direct each federal agency in carrying out its responsibilities for disposing of federal lands, to provide leadership and take actions to reduce the risk of flood loss or loss or degradation of wetlands, to minimize the impacts of floods on human safety, health and welfare and to restore and

preserve the natural and beneficial values served by floodplains and wetlands. The Executive Orders further state that when property in floodplains or wetlands is proposed for disposal to non-federal, public or private parties, the federal agency shall take the following actions: (1) Reference in the conveyance, those floodplain and wetland regulations; and (2) attach other appropriate restrictions to the uses of properties by the purchaser and, say successors; or (3) withhold such properties from conveyance.

A recent Field Solicitor's opinion dated April 7, 1983, expands on these requirements with the following statement: The BLM can "authorize the sale of wetlands when:

1. The tract of public wetlands is either so small or remote that it is uneconomical to manage.
2. The tract of public wetlands is not suitable for management by another federal agency.
3. The patent contains restrictions of uses as prohibited by identified Federal, State or local wetland regulations.
4. The patent contains restrictions and conditions that ensure that the patentee can maintain, restore and protect the wetlands on a continuous basis.

If any of these four requirements cannot be satisfied, with respect to a particular wetlands tract, the tract must be retained in federal ownership and administered by the Bureau in the manner set forth in BLM Manual, Part 6740". Therefore, it is our policy to retain in federal ownership all wetlands, riparian, and floodplain areas if their disposal would violate the intent of Executive Orders 11988 or 11990.

32-9 Numerous factors were used to determine overall riparian habitat condition (see response to 3-36 and C-1) not just riparian vegetation. If a stream segment was of poor or fair water quality, due to land management practices on lands adjacent to this segment, it also affected the fisheries potential we felt this segment had. Sometimes the public land segment was not selected for improvement due to the public land parcel being a very small portion of the entire grazing allotment and thus impractical to try to improve at this time. We decided not to try to improve riparian habitat conditions on streams where livestock grazing was not going to be intensively managed unless there was good fishery habitat involved. It is our intent to concentrate our efforts and available funding to improve that riparian habitat that is of the highest priority. Please refer to response 28-8 for more information.

32-10 See response 32-6.

32-11 With the budget provided to carry out work in the soil, water and air subactivity, and all other supporting activities, for all BLM lands in the Idaho Falls District, the monitoring budget is a realistic estimate of funds available for work of this nature. Also, please refer to response 30-2.

The Draft Resource Management Plan, Water Quality/Riparian Monitoring Guidance has not been finalized. Upon finalization of this guidance, the BLM will incorporate this new information into the water quality and riparian portions of the monitoring plan for the Pocatello RMP.

33-1 Please refer to response 32-6.

33-2 As stated above, numerous factors were used to determine overall riparian habitat condition, not just riparian vegetation alone. If a stream segment was of poor or fair water quality, due to land management practices on lands adjacent to this segment, it also affected the fisheries potential we felt this segment had. Sometimes the public land segment was not selected for improvement due to the public land parcel being a very small portion of the entire grazing allotment. We decided not to try to improve riparian habitat conditions on streams where livestock grazing was not going to be intensively managed unless there was good fisheries habitat involved. It is our intent to concentrate our efforts and available funding to improve that riparian habitat that is of the highest priority.

33-3 Please refer to response 28-8.

33-4 Overall riparian habitat conditions will be thoroughly evaluated every three to five years. Specific allotments in Table A.4, pages A-24 through A-73 of the Draft Pocatello RMP/EIS, will be monitored for utilization on key riparian plants annually.

Please refer to responses 30-2 and 32-11.

33-5 The 50% utilization factor we propose for key riparian plans is our maximum allowance. We feel the utilization factor will vary from 0% to 50% depending upon the grazing formula, weather patterns, and stocking rate.

We are comfortable in identifying 50% as our maximum utilization factor.

Provisions for moving livestock are "built" into each Allotment Management Plan. We feel this falls under standard operating procedures and would be premature to mention in our planning documents.

33-6 SOP outlined on pages 51 and 53 require that we consult with you before we do any brush control work. This will be done. In the past, disposals were made, if not with your blessing, at least not over your strong objections. We intend to continue this. Most of the acreage proposed for brush control is in Bear Lake County.

33-7 The sharp-tailed grouse is currently listed in the Master Memorandum of Understanding between our two agencies. Any proposed vegetation alterations are done after consultations with your agency. We also feel that the PRA has a good cooperative effort going with Fish and Game to locate and identify leks of both sage and sharp-tailed grouse.

- 33-8 Please refer to Table (4.2), page 4-15 of the Draft RMP/EIS for 15 year hunting estimates. Criteria for satisfactory and unsatisfactory habitat is explained in response 28-6. The reason no aspen management is included in any alternative is explained on page 3-17.
- 33-9 In the last 5 years only two exceptions come to mind that were granted for activities in big game winter ranges between November 15 and April 30. These were allowed after either a Fish and Game or BLM biologist flew the area in a helicopter to determine that the game were not currently using the area in question. In any case, documentation of the rationale will be documented for the waiver.
- 33-10 It was an oversight to not recognize the fine spotted and Yellowstone cutthroat trout as fish species of special concern on page 3-22 of the Draft Pocatello RMP/EIS. Fisheries habitat will improve along with improvements in riparian habitat conditions on 15.55 miles of stream inhabited by cutthroat trout in the preferred alternative. Please refer to Table (4.2), page 4-15 of the Draft RMP/EIS for 15 year fishing estimates.
- 33-11 Fish and riparian conditions will also be incorporated into AMPs where such habitat exists.
- 33-12 We understand your concern about riparian sediment effects on stream fisheries. We desire to also keep stream sediment to a minimum. Our 5 tons per acre per year erosion triggering mechanism is a monitor system designed for short sheet and rill erosion movement on upland slopes above and beyond our stream drainageways. Since most of the soil movement is for a short distance, studies have verified that only a small fraction of this erosion actually enters the stream.
- To monitor upland erosion we are using the Erosion Bridge Method as developed by the Forest Service in Fort Collins, Colorado (The Erosion Bridge by D.G. Blaney and G.E. Warrington WSDG Report WSDG TP 00008, August 1983). The actual movement of soil thickness at 5 tons per acre per year is equal to about the thin side thickness of a dime. We are not certain that it is physically possible to monitor or measure any soil movement less than this on the uplands.
- The SCS's 1984, Idaho's Soil and Water: Condition and Trend, states that 5 tons per acre erosion is an "acceptable" rate because this is near the rate soil is replaced through natural processes. We have selected this rate as a practical measureable monitoring level, that we can physically measure on our upland soils and anticipate only a small fraction of this upland soil movement to actually move far enough to enter our riparian stream systems.
- 33-13 Although not listed in the rationale on page 38, it is recognized that wildlife-based recreation is important to the economy of the Pocatello Resource Area. In Chapter 3, page 48, it was identified that direct recreation expenditures for hunting and fishing account for over 10 percent of the retail trade sector of the regional economy.

The economic values used in this EIS (the expenditures per visitor day) were based on a study of Idaho hunters and fishermen in which the Idaho Department of Fish and Game was one of the cooperators (along with the U.S. Forest Service and the BLM).

In the analysis of impacts, the multiplier effect of recreation earnings was taken into account (see pages 4-23, 4-39, 4-55, 4-70, and 4-86 of the Draft RMP/EIS).

The direct and secondary income generated by alternative B (preferred) is higher than that for Alternative C (production) primarily as a result of the impacts on wildlife-based recreation that occurs in Alternative C. From a strict economic viewpoint (in terms of regional income and employment impacts), there is little difference (overall) between alternatives. As was mentioned above, the alternatives impact the different segments of the economy (livestock grazing, recreation, etc.) differently but they nearly offset one another, making the net differences between alternatives very slight.

33-14 In paragraph two, under Range, you made the comment that the statement "grazing increases resulting from range improvements would occur only if long term monitoring indicates it to be prudent", should apply to all alternatives, not just Alternative D.

This assumption is correct; "grazing increases resulting from range improvements would occur only if long-term monitoring indicates it be prudent", applies to all alternatives. This has been standard operating procedure in the Bureau for years.

33-15 In the third paragraph, under Range, you feel that it may be difficult for us to carry out successfully the protection of riparian habitat.

An increase in grazing and better protection for riparian areas is possible and has been effective throughout the Bureau when livestock graze under a formula specifically written for an area where the major objective is to either rest or eliminate grazing from creek bottoms.

Monitoring will be handled within areas on a priority basis; the more sensitive areas receiving higher priority. We feel there will maybe never be enough people to monitor all areas; hence, the priority categorization.

33-16 In paragraph four, under Range, your concern is how, with the apparent manpower and money limitation, are we going to properly monitor all 415 allotments.

We may never monitor all 415 allotments since not all are presently considered in bad shape. We have categorized by priority the allotments we feel need monitoring. We have estimated that for the 1987 season we will monitor 52 allotments. At this rate, if we elected to monitor all 415 allotments, it could be done in less than 8 years with our present manpower.

We have had a good deal of past experience drafting Allotment Management Plans and feel that writing eight (8) each year is achievable.

33-17 Due to space limitations, the standard operating procedures that guide management of BLM timberlands were not listed.

The standard operating procedures are described in the Timber Management Eastern Idaho Sustained Yield Unit-Final Environmental Analysis Record, which was referenced in the Draft RMP document, page 5, and which is available for public review in this office.

33-18 Please refer to page 1, second paragraph, of the Draft RMP/EIS and response 32-1.

In the second paragraph, under Alternatives, Part Vii, you have suggested that we consider your suggested evaluation system.

We have inventoried the area using a system called "Ecological Site Condition". This condition consists of the following five (5) criteria:

1. Potential Natural Community,
2. Late Seral,
3. Mid Seral,
4. Early Seral and,
5. Disturbed

We do not look at the area from the standpoint of excellent, good, fair, and poor in relation to livestock. We look at the areas in relation to ecological condition projection in each alternative and what we expect under that type of management.

33-19 The majority of the public lands in this resource area are scattered/isolated making it appear that is our only consideration in deciding which parcels are identified for disposal. On pages 42-45, Draft RMP/EIS, the criteria that would be applied to site-specific determinations for lands that are within transfer areas are listed. "Difficulty and cost of administration (manageability)" is only one of the criteria.

33-20 In the past all proposed disposals were presented to your Department for review. Several were cancelled due to your objections. Some parcels that had wildlife values but not "high wildlife values" were sold. We intend to continue to consult with you before disposal procedures are initiated and are willing to cancel a disposal if new information comes to light.

The statement you referred to on page 36, Draft RMP/EIS, states "...retain tracts that have high wildlife and multiple use public values. Only parcels of relatively low multiple use value ...are identified for transfer". Most of the areas you referred to would be disposed of through exchange where we receive lands that are equal or greater in public interest. Each parcel is evaluated on a case-by-case basis.

PUBLIC HEARINGS

Name	Representing	Testimony		Response
		Oral	Written	Prepared
<u>Pocatello Hearing 4-15-87</u>				
Robert V. Kimball	J.R. Simplot Co.	X		X
Clark Collins	Blue Ribbon Coalition	X	X	X
Charles H. Trost	Portneuf Valley Audubon Soc.	X	X	X
Clair Hanks	Residents on Trail Creek Rd.	X		X
Karl Holte	Self	X		
David Witworth	Self	X		
<u>Soda Springs Hearing 4-16-87</u>				
David Farnsworth	Monsanto Company	X		
Ariel Larson	Users of Formation Springs	X		X
Mike Panting	Self	X		X
Milton Smith	Leaseholders in Thatcher Area	X	X	X
Dennis Facer	J.R. Simplot Co.	X		X
Robert V. Kimball	J.R. Simplot Co.	X		
Clayton Schmitt	City of Soda Springs	X		X
Rulon C. Shaw	Shaw Land and Livestock	X		
Marriner Jensen	Self	X		X
Terry Smith	Self	X		
Clyde Jensen	Self	X		X

HEARING COMMENTS AND RESPONSES

Robert V. Kimball, J.R. Simplot Company

Comment #1: First of all, I'd like to mention that the Petticoat Peak withdrawal, we feel, is somewhat excessive, particularly in consideration of the definition of a road as it would apply to that area.

Response: Petticoat Peak was designated a Wilderness Study Area and covered in a separate environmental document and, as a result, it must be managed according to BLM's Interim Management Policy for Lands Under Wilderness Review, until Congress makes it's decision. It is outside the realm of this planning document to address Petticoat Peak until Congress makes it's decision. The Interim Management Policy for Lands under Wilderness Review defines the roads (ways) that must apply to the area.

Comment #2 As far as Cadastral Surveys are concerned, we recommend that a more vigorous survey program be initiated. I refer particularly to the Chesterfield area, where we need section corners re-established as well as other areas where solid leasable minerals are involved, so that the adequate subdivision of the sections can be determined accurately.

Response: As identified on page 61 of the Draft RMP/EIS, we also see the need for a continued program in cadastral survey. Survey requirements and priorities are determined on a yearly basis as a part of the annual work planning process. Your identification of need in the Chesterfield area will help us prioritize surveys in the future.

Comment #3 We feel that timber harvest should remain the same as is currently authorized.

Response: As indicated on page S-10 of the Draft RMP/EIS, we anticipate the harvest levels to be consistent with previous years.

Comment #4 The recommendations that have been made for special stipulations on mine plans or on fringe acreages are not warranted, considering that the impacts from the watershed area from the Formation Springs, as an example, are not reasonable.

Response: The Bureau of Land Management utilizes the NEPA process to develop permit, lease, and mine plan stipulations. A major component of this process is to address the concerns of affected individuals, organizations, and local or governmental agencies. As additional resource data becomes available, the Bureau reviews environmental documents and the resulting

mitigating measures to ensure that the mitigating measures are still necessary and that they provide the necessary protection for affected resources.

With relationship to stipulations for the protection of Formation Springs, the BLM will continue to develop reasonable protective stipulations for proposals on BLM lands which could affect the quality of Soda Springs' water supply.

Clark Collins, Blue Ribbon Coalition

Comment Our only objection would be to the wording on page 4-28 to the effect that ORV activities would have the negative impact of gates being left open and livestock harassment.

Response To state that these impacts, as described on page 4-28, do not occur would be a false statement. These types of impacts do occur in the resource area. What must be stressed, however, is that they result from only a few individuals. Organized groups of ORV users provide much of the education and guidance needed to alleviate these impacts.

Charles H. Trost, Portneuf Valley Audubon Society

Comment #1 Specifically, I am saying that I think there ought to be more money and effort spent on fencing riparian habitats. Cows in the riparian habitats modify the environment so there are several species of birds that cannot nest there because of modified environment and, in addition, they bring in the Brown-headed Cowbirds, which are a nest parasite, and that puts an additional stress on the native birds that are in this habitat.

Response: Please refer to letter response 28-8.

Comment #2 There are a couple of specific things I would like to see addressed a little more carefully in the EIS. One of them deals with BLM lands east of Gray's Lake Refuge, and that is that there are two isolated tracts of, I believe, 40 acres, and there's another tract between the Gray's Lake Refuge and the Forest Service lands which, I think, BLM ought to manage as critical habitat for Whooping Cranes.

Response: Please refer to page 3-22 of the Draft RMP/EIS, under Whooping Crane and Map #15 on page 3-21. As near as we can tell, the isolated tracts you are concerned with are inside the Whooping Crane critical habitat area identified.

Comment #3 Finally, there's a spring east of Soda Springs, I believe it's called Formation Spring, and I want to commend BLM for their research natural area designation for this, as well as several other areas. By the way, I want to also say we're pleased to

see areas of critical environmental concern designated in this report. But Formation Springs specifically, there's a large watershed behind Formation Spring that I think should be designated a critical watershed for the City of Soda Springs. The reason being, that the water that comes out in Formation Springs, which is what Soda Springs uses for their water supply, comes from the drainage uphill. And that should be preserved as a critical watershed, just as BLM has done for the City of Downey.

Response: Recharge to the ground water flow system feeding Formation Springs is believed to occur primarily in the interior valleys between the Aspen Range and the Webster Range (Ralston, August 1984). The 340 acres managed by the BLM lying east of Formation Springs is not a recharge area for the Springs. The only concern associated with the 340 acre parcel is possible surface water contamination that may enter the creek downstream from the Spring (point of diversion for city water supply). Some grazing occurs on this 340 acres at present, but these grazed acres do not drain into Formation Springs. The grazing that does occur on the 340 acres (BLM) is approximately 1/4 of a mile from the Spring and Creek.

Mineral potential for the 340 acres is low to nonexistent and, as a result, no mineral activity is expected to occur on the 340 acre parcel in the future.

As a result of the above described information, the BLM feels that a special designation for the 340 acres is not warranted. We do, on the other hand, feel it necessary to work closely with the City of Soda Springs on any future ground disturbing activity associated with the 340 acre parcel, if and when such activity is presented.

- If at any time in the future an activity or development is proposed on the BLM administered 340 acre parcel east of Formation Springs, the BLM will coordinate the analysis of the proposal with the City of Soda Springs.

For more information on Formation Springs, please refer to Appendix I in this document.

Clair Hanks, Residents on Trail Creek Road

Comment I am concerned about three things: One is the shooting on Bureau of Land Management land, another is the motorized vehicles, and the other is the litter on Trail Creek.

Response: The subject of shooting firearms in the Trail Creek area has spawned several meetings and discussions over the past year. As a result, the BLM has adopted the following position.

Although the BLM has some public land in the Trail Creek area, we feel that most of the shooting is occurring on private lands. The BLM would be happy to work with the

local government as long as they initiate the policies for Trail Creek.

Under the preferred alternative, ORV use will be limited to existing roads and trails in the Trail Creek area. The Idaho Falls District is currently in the process of hiring a fulltime BLM Ranger to handle law enforcement problems occurring on public lands. It is our belief that this individual will help alleviate problems occurring on public lands by enforcing the off road vehicle designation.

We agree that littering is a problem in the Trail Creek area. At present we have posted signs instructing the public to pack out what they pack in. We also have a yearly cleanup using volunteer help. Again, the majority of the littering is occurring on private land.

Ariel Larson, Users of Formation Springs

Comment What we're concerned about is, we feel that the watershed should be protected for the use of the people for their water. We had one meeting last year, and the statement did not show that this would be protected as a watershed. That's all I have to say.

Response: Please refer to hearing response #3, Charles H. Trost.

Mike Panting, Self

Comment It is critical that the area directly east and above Formation Springs not be threatened by anymore strip mining. Therefore, I feel that the 340 acres should be withdrawn from mineral entry and a case to be made for withdrawing lands even farther to the east, although I feel that the 340 are definitely the most critical, because they lie directly above and to the east of Formation Springs. That's all I have.

Response: Please refer to hearing response #3, Charles H. Trost.

Milton Smith, 15 or 20 BLM Leaseholders in the Thatcher Area

Comment We, as a group, feel that the best interest of all concerned is to keep our leases with the BLM. We want no part of State Land Board Management. In the past we have been forced to change our turnout dates to be the same as Cottonwood Grazing Association. That's more than we want to do, but we go along. We have alot better working agreement with the BLM people than with the so-called State Land Board experts.

Response: We have reviewed the Cottonwood Block and have found that the exchange, as now proposed, would not meet the public interest criteria established by Section 206 of FLPMA. We have

therefore not changed the preferred alternative which identifies the lands for retention.

Dennis Facer, J.R. Simplot Company

Comment #1 Petticoat Peak Withdrawal. The Petticoat Peak area probably does not qualify under the roadless withdrawal criteria in that there are presently roads which traverse this area and which are regularly used for access by stockmen, hunters and ORV users.

Response: Please refer to hearing response #1, Robert V. Kimball.

Comment #2 Asset Management Program. The asset management program should be reactivated in order to divest those parcels which are surrounded by fee land and for which there is no public access. These parcels cannot be adequately administered by the BLM. Such lands should be actively exchanged or even sold with the surrounding property owner being given first right of refusal. BLM holdings should be consolidated to promote more efficient administration of these lands through sale, exchange or the R&PP process.

Response: Please refer to page 25 of the Draft RMP/EIS. We have identified 17,068 acres for possible disposal through sale, exchange or R&PP. The BLM feels these lands meet the criteria necessary for disposal.

Comment #3 Access to Public Lands. BLM should actively procure access across fee lands to public lands through the proposed easement process but short of condemnation. This is a matter of great concern to the general public and would create a very favorable impression on the vast majority of public land users. Funds should be appropriated for this program on a priority basis.

Response: Please refer to page 31 of the Draft RMP/EIS. We have identified approximately 44 miles of road and trail access for acquisition.

Comment #4 Cadastral Surveys. Cadastral surveys should be completed on public lands where there are currently no section corners. Indeed, we have better maps of the moon than some of the public lands. Section and quarter corners are urgently needed in some unsurveyed lands, so that federal leases can be accurately delineated. Since these leases are based on aliquot subdivisions of land sections, the brass caps are the basis for lease boundaries.

Response: Please refer to hearing response #2, Robert V. Kimball.

Comment #5 Hydrology. Considering the Soda Springs Watershed Protection Area, attention is invited to the ground water hydrology already by reputable consultants with regard to potential impacts on water quality. As an example, the ground water emanating from Formation Springs, which is used as a supplemental culinary water source by the City of Soda Springs, is connate water percolating up a major basin and range fault plane.

Response: Please refer to hearing response #4, Robert V. Kimball and hearing response #3, Charles H. Trost.

Clayton Schmitt, City of Soda Springs

Comment But our concern is that we feel the plan has failed to address at all the protection of the Formation Springs water supply to the City of Soda Springs. We felt that this should have been addressed; it should have been reviewed; and, there should have been some kind of appropriate process put in there to ensure the continued quality, so that those people living in Soda Springs could continue to receive water that was not degraded by any type of use, whether it would be mining, grazing, or any other type.

Response: Please refer to hearing response #3, Charles H. Trost.

Marriner Jensen, Self

Comment I'm a rancher over in the Dingle area, and I, and a number of the ranchers in that area, are concerned with the growing use of four-wheel drives on the BLM and going indiscriminately across everywhere, through fences and wherever they might decide they wished to go.

Response: We have identified 3,537 acres closed to off-road vehicle use in the resource area. This is approximately 11 times more acres closed than what exists at present. Along with 185,829 acres identified as limited use, we hope to gain controls on ORV use. Also, the Idaho Falls District is currently in the process of hiring a fulltime BLM Ranger to handle law enforcement problems occurring on public lands. It is our belief that this individual will help alleviate problems occurring on public lands by enforcing the off-road vehicle designation.

Clyde Jensen, Self

Comment I have read through your alternative plans, and I feel that Alternative B, in a lot of ways, has a lot of good points to it as in minerals and forest management, but I have to disagree with the ORV use and the amounts of area that will be controlled or limited vehicle use. I don't think that that

much vehicle use is necessary for the resources that we have at this time. Thank you.

Response: Please refer to hearing response, Marriner Jensen and 26-1.

APPENDICES

- G. Minerals (additional information on BLM Oil and Gas Operations Requirements and Stages of Exploration and Development)
- I. Formation Spring Meeting/Field Trip
- J. Support information on Minerals Maps B3 and B4

APPENDIX G

Bureau of Land Management
Oil and Gas Operations Requirements

I. Geophysical Operations Permitting Process

Geophysical operations conducted on or off an oil and gas lease on lands administered by the Bureau of Land Management (BLM) are reviewed by the appropriate BLM authorized officer. The responsibilities of the geophysical operator and the BLM authorized officer during geophysical operations are as follows:

A. Geophysical Operator - The operator is required to file, in person or by mail, a "Notice of Intent to Conduct Oil and Gas Exploration Operations" for all operations on public lands administered by BLM (Form 3040-1 is available at all BLM District and Area offices). The notice is to include maps showing the location of the lines, and all access routes, and must be filed in the BLM Resource Area Office before operations begin.

The operator is also required to be bonded. A copy of the bond or other evidence of satisfactory bonding shall accompany the "Notice of Intent". Proper bonding can include a nationwide or statewide oil and gas bond with a rider for geophysical exploration or a \$5,000 individual surety bond filed with the District Manager.

Surface disturbing activities, such as bulldozing, require written approval of the Area Manager. Operators may be required to submit an archeological survey if dirt work is contemplated. The operator is required to comply with all applicable federal, state, and local laws such as the Federal Land Policy and Management Act of 1976, Historic Preservation Act of 1966, Threatened and Endangered Species Act, etc.

Any changes in the original Notice of Intent must be submitted in writing to the Area Manager. Written approval must be secured before activities proceed.

When operations are completed, the operator is required to file a Notice of Completion of Geophysical Exploration, after any required rehabilitation work is completed (Form 3045-2).

B. BLM Area Manager - The Area Manager is required to contact the operator immediately after the Notice of Intent is filed and explain the terms of the Notice, including the operating procedures to be followed, all current laws, and all BLM administrative requirements. A prework conference or field inspection may be conducted and written instructions or orders given to the operator. The Area Manager is responsible for the examination of resource values and the development of appropriate surface protection and reclamation measures.

Final inspection following filing of the Notice of Completion is also required of the Area Manager.

Mitigation

Seasonal restrictions may be imposed on geophysical operators to reduce conflicts with wildlife and to prevent watershed damage. The most critical management practice is compliance monitoring during and after seismic activity. Compliance inspections during the operation ensure that stipulations are being followed. Compliance inspections upon completion of work ensure that the lines are clean and the drill holes are properly plugged.

II. Oil and Gas Leasing Process

The Mineral Leasing Act of 1920 provides for the leasing of oil and gas on those lands owned by the Federal government. The Bureau of Land Management is the leasing agency for lands administered by the Bureau as well as those administered by the U.S. Forest Service.

Oil and gas leases may be issued competitively or noncompetitively. Competitive leases are for lands inside known geologic structures (KGS). A KGS is technically the geologic trap in which a productive accumulation of oil or gas has been discovered by drilling. All presumptively productive acreage is included within the KGS limits. A competitive lease sale is scheduled at two month intervals to sell any unleased KGS lands. Each sale is conducted by sealed bid. For each bid deemed adequate and accepted, a lease is issued. Competitive leases are issued for a term of five years or for as long as oil and/or gas is produced. There are currently no KGSS within the State of Idaho.

Noncompetitive leases are issued for lands lying outside of KGSS. These leases are of two types: the simultaneous offering list and over-the-counter offers.

Following termination of old leases, the land is relisted on simultaneous lists published at two month intervals. Appropriate mitigating measures are added to leases for resource protection prior to listing. Once a list is approved and advertised, all applications received during the filing period are considered to have been filled simultaneously. An applicant may file only one application per tract. Each application must be accompanied by a \$75.00 filing fee and advance lease rental. A lottery-type drawing is held and one application is drawn for each tract. If a tract has never been leased or a simultaneous tract does not receive an application when advertised for lease, it becomes an over-the-counter offer and is available to the first applicant filing for that tract. Noncompetitive leases are issued for 10 years or for as long as oil or gas is produced.

The federal government receives yearly rental fees on nonproducing leases. Royalty on production is received on producing leases, one half of which is returned to the State.

In the two month interval between simultaneous listings, oil and gas lease stipulations and restrictions identified in this Resource Management Plan (RMP) are applied to recently terminated or expired lease offers that will be included in the next simultaneous list. In

addition to standard stipulations, the following are the most commonly utilized special lease stipulations:

- No access or work trail or road, earthcut or fill, structure or other improvement, other than an active drilling rig, will be permitted if it can be viewed from the (road, lake, river, etc.).
- No occupancy or surface disturbance will be allowed within (feet of river, stream, lake, historic trail, etc.). This distance may be modified when specifically approved in writing by the District Manager, BLM.
- In order to (minimize watershed damage, protect important seasonal wildlife habitat, etc.) exploration, drilling, and other development activity will be allowed only from () to (). This limitation does not apply to maintenance and operation of producing wells. Exceptions to this limitation in any year may be specifically authorized in writing by the District Manager, BLM.

The U.S. Forest Service also provides stipulations for leases issued for lands under their administration.

Oil and Gas Exploratory Units - Surface use in an oil or gas field may be affected by unitization of the leaseholds. In areas of federally owned minerals, an exploratory unit is formed before a wildcat exploratory well is drilled. The boundary of the unit is based on geologic data. The developers of the unit can enter into an agreement to develop and operate as a unit, without regard to separate lease ownerships. Costs and benefits are allocated according to agreed-upon terms.

Unitization reduces the surface use requirements because all wells are operated as though on a single lease. Duplication of field processing facilities is minimized, because development and operations are planned and conducted by a single operator. Often powerlines are distributed throughout the unit and diesel engines are converted to electric motors. Unitization may also involve wider spacing than usual, resulting in fewer wells. Access roads are usually shorter and better organized.

III. The Drilling Permit Process

A federal lessee or operator is governed by procedures set forth by the Onshore Oil and Gas Order No. 1, "Approval of Operations on Onshore Federal and Indian Oil and Gas Leases", issued under 43 CFR 3164. Operating Order No. 1 lists the following as pertinent points to be followed by the lessee or operator: notice of staking (NOS); application for permit to drill (APD), which includes a multi-point surface use and operations plan; approval of subsequent operations; well abandonment; water well conversion; responsibilities on privately owned surface; and reports and activities required after well completion.

A. Notice of Staking (NOS) - After the lessee or operator makes the decision to drill a well, they must decide whether to submit an NOS or application for permit to drill (APD). The NOS consists of an outline

of what the company intends to do including a location map and sketched site plan. The NOS is then used as a document to review any conflicts with known critical resource values, and also used at the on-site inspection to provide the preliminary data to assess what additional items are necessary to complete the APD.

B. Application for Permit to Drill (APD) - The operator or lessee may submit a completed APD in lieu of notice of staking, but in either case no surface activity is conducted in conjunction with the drilling until the APD is approved by the BLM.

If the APD option is chosen, an APD is submitted to the BLM and a field inspection is held with the operator and any other interested party. The purpose of the presite field inspection is to evaluate the operator's plan, to assess the situation for possible impacts (surface and subsurface), and to formulate resource protection stipulations. To lessen environmental impacts, a proposed site may be moved, reoriented, or redimensioned, within certain limits, at the presite inspection. The proposed access road may also be rerouted. If necessary, site-specific mitigations are added to the APD for protection of surface and (or) subsurface resource values in the vicinity of the proposed activity.

The Bureau of Land Management is responsible for preparing the necessary environmental documentation for drilling proposals on the Federal lands. Applications for Permit to Drill single exploratory wells have been categorically excluded from the preparation of Environmental Assessments. If, however, one or more of the exceptions to categorical exclusion apply, an Environmental Assessment is prepared.

When final approval is given by the BLM to drill, the lessee or operator may commence construction and drilling operations. Approval of an APD is valid for one year. If construction does not begin within one year, the conditions of approval of the APD must be reviewed prior to approving another APD.

Throughout the drilling operation, the BLM conducts inspections to ensure that the oil and gas operating regulations and the conditions of approval in the APD are being complied with.

Issuance of Rights-of-Way

Rights-of-way are required for all facilities, tank batteries, pipelines, and access roads that occupy federally owned land outside the lease or unit boundary. When a third party (someone other than the lessee/operator or the federal government) constructs a facility or installation on or off the lease, a right-of-way is also required. The right-of-way is issued by BLM. Currently BLM is finalizing standard stipulations to be utilized by all BLM offices for issuance of rights-of-way.

Plugging and Abandonment of Wells

The purpose of plugging and abandoning (P&A) a well is to prevent fluid migration between zones, to protect minerals from damage, and to restore the surface area. Each well has to be handled individually due to a

combination of factors, including geology, well design limitations, and specific rehabilitation concerns. Therefore, only minimum requirements can be established, then modified for the individual well.

The first step in the P&A process is the filing of the Notice of Intent to Abandon (NIA). This will be reviewed by both the Surface Management Agency (SMA) and the BLM District Office. The NIA must be filed and approved prior to plugging a past producer. Verbal plugging instructions can be given for plugging current drilling operations, but a NIA must be filed after the work is completed. If usable fresh water was encountered while the well was being drilled, the SMA will be allowed, if interested, to assume future responsibility for the well and the operator will be reimbursed for the attendant costs.

The operator's plan for securing the hole is reviewed. The minimum requirements are as follows: In open hole situations, cement plugs must extend at least 50 feet above and below zones with fluid which has the potential to migrate, zones of lost circulation (this type of zone may require an alternate method to isolate), and zones of potentially valuable minerals. Thick zones may be isolated using 100-foot plugs across the top and bottom of the zone. In the absence of productive zones and minerals, long sections of open hole may be plugged with 150-foot plugs placed every 2,500 feet. In cased holes, cement plugs must be placed opposite perforations and extending 50 feet above and below except where limited by plug back depth.

A permanent abandonment marker is required on all wells unless otherwise requested by the SMA. This marker pipe is usually at least 4 inches in diameter, 10 feet long, 4 feet above the ground, and embedded in cement. The pipe must be capped with the well identity and location permanently inscribed.

The SMA is responsible for establishing and approving methods for surface rehabilitation and determining when this rehabilitation has been satisfactorily accomplished. At this point, a Subsequent Report of Abandonment can be approved.

IV. Development and Production Process

Production facilities are generally located on the pad built prior to the well being drilled. These production facilities are identified and approved in the Application for Permit to Drill the well. Should additional surface disturbance be required for production operations, the lessee or operator must notify and get the approval of the BLM authorized officer prior to conducting the work. Monthly Reports of Production for the well are required from the lessee or operator.

The Stages of Exploration and Development
in an Oil and Gas Field

I. Preliminary Investigation

Oil and gas can be discovered by either direct or indirect exploration methods such as the mapping of rock outcrops, seeps, borehole data, and remote sensing data. In many cases indirect methods, such as seismic, gravity, and magnetic surveys are required to delineate subsurface features which may contain oil and gas.

Gravity Surveys - Gravitational prospecting detects microvariations in gravitational attraction caused by the differences in the density of various types of rock. Data derived from gravity surveys are used to generate anomaly maps from which faults and general structural trends can be interpreted.

Geomagnetic Surveys - Magnetic prospecting is most commonly used for locating metallic ore bodies but is used to a limited extent in oil and gas exploration. Magnetic surveyors use an instrument called a magnetometer to detect small magnetic anomalies caused by mineral and lithologic variations in the earth's crust. Magnetic surveys can detect large trends or lineaments in basement rocks and the approximate depth to those basement rocks.

Seismic Reflection Surveys - Seismic prospecting is the best and most popular indirect method currently utilized for locating subsurface structures which may contain oil and(or) gases. Seismic energy (shock waves) is induced into the earth using one of several methods. As these waves travel downward and outward, they encounter various strata, each having a different seismic velocity. As the wave energy encounters the velocity interface between stratigraphic layers where the lower stratum is of lower velocity, some of the seismic energy is reflected upward. Sensing devices, commonly called geophones, are placed on the surface to detect these reflections. The geophones are connected to a data recording truck which stores data on magnetic tape. The time required for the shock waves to travel from the shot point down to a given reflector and back to the geophone can be related to depth by multiplying velocity by one half the travel time. The average velocity for the section between the surface and a given reflector must be estimated if no bore hole seismic data is available. This velocity estimation is the source of many errors in the seismic interpretation of wildcat areas. There are many methods available today which an explorationist can use to induce the initial seismic energy into the earth. All methods require preliminary surveying and laying of geophones.

The thumper and vibrator methods pound or vibrate the earth to create a shock wave. Usually four large trucks are used, each equipped with vibrator pads (about four-foot square). The pads are lowered to the ground and vibrators on all trucks are triggered electronically from the recording truck. Information is recorded and then the trucks move forward a short distance and the process is repeated. Less than 50 square feet of surface area is required to operate the equipment at each test site.

The drilling method utilizes truck-mounted drills which drill small-diameter holes to depths of 100 to 200 feet. Four to twelve holes are drilled per mile of line. Usually, a 50-pound charge of explosives is placed in the hole, covered, and detonated. The detonated explosives send energy waves below the earth's surface which are reflected back to the surface from various subsurface rock layers. The holes are drilled in a linear fashion, forming a line that can be many miles in length. In rugged topography, a portable drill is sometimes carried in by helicopter. Charges are placed in the hole as in a truck-mounted operation. Another portable technique is to carry the charges in a helicopter and place the charges on wooden sticks, or lath, three feet or so above the ground. Charges used are either 2 1/2 or 5 pounds. Usually, 10 charges in a line on the ground are detonated at once.

A typical drilling seismic operation may utilize 10 to 15 men operating five to seven trucks. Under normal conditions, three to five miles of line can be surveyed each day using the explosive method. The vehicles used for a drilling program include several heavy truck-mounted drill rigs, water trucks, a computer recording truck, and several light pickups for the surveyors, shot hole crew, geophone crew, permit man, and party chief. Public roads and existing private roads and trails are used. Off-road cross-country travel is also necessary. Motor graders and(or) dozers may be required to provide access to remote areas. Several trips a day are made along a seismograph line; this usually establishes a well defined two-track trail. Drilling water, when needed, is usually obtained from private landowners or local city officials.

II. Exploratory Drilling

Surface Disturbance Associated with Exploratory Drilling - Upon receiving approval to drill the proposed well, the operator moves construction equipment over existing roads to the point where the access road will begin. Generally, the types of equipment include dozers (track-mounted and rubber-tired), scrapers, and motor-graders. Moving equipment to the construction site requires moving several loads (some overweight and overwidth) over public and private roads. Existing roads and trails are improved in places and occasionally culverts and cattleguards are installed if required.

The length of the access road varies. Generally the shortest feasible route is selected to reduce the haul distance and construction costs. Environmental factors, or the landowner's wishes, may dictate a longer route. In rough terrain, the type of construction is sidecasting (using the material taken from the cut portion of the road to construct the fill portion); slightly less than one-half of the road bed is on a cut area and the rest is on a fill area. Roads are usually constructed with an 18-foot-wide running surface (in relatively level terrain). Soil texture, steepness of the topography, and moisture conditions may dictate surfacing the access road in some places but generally not for the entire length. The total acreage disturbed for each mile of access road constructed varies significantly with the steepness of the slope.

Well locations are constructed by one of three different general types of construction, but in every case, all soil material suitable for plant

growth is first removed from areas to be disturbed and stockpiled in a designated area. Sites on flat terrain usually require little more than removing the topsoil material and vegetation. Drilling sites on ridge tops and hillsides are constructed by cutting and filling portions of the location. The majority of the excess cut material is stockpiled in an area that will allow it to be easily recovered for rehabilitation. It is important to confine extra cut material in stockpile rather than cast it down hillsides and drainages where it cannot be recovered for rehabilitation.

Rotary Drilling - Starting to drill is called "spudding in" the well. Initially, drilling usually proceeds rapidly mainly due to the incompetent nature of shallow formations. Drilling is accomplished by rotating special bits under pressure. While drilling, the rig derrick and associated hoisting equipment bear a great majority of the drill string's weight. The weight on the bit itself is generally a small fraction of the total drill string weight. The combination of rotary motion and weight on the bit causes rock to be chipped away at the bottom of the hole. The rotary motion is created by a square or hexagonal rod, called a kelly, which fits through a square or hexagonal hole in a large turntable, called a rotary table. The rotary table sits on the drilling rig floor and as the hole advances, the kelly slides down through it. When the kelly has gone as deep as it can, it is raised, and a piece of drill pipe about 30 feet in length is attached in its place. The drill pipe is then lowered, the kelly is attached to the top of it, and drilling recommences. By adding more and more drill pipe, the hole can steadily penetrate deeper.

Drilling mud is circulated through the drill pipe to the bottom of the hole, through the bit, up the bore of the well, through a screen which separates the rock chips, and into holding tanks from which it is pumped back into the well. The mud is maintained at a specific weight and thickness to cool the bit, reduce the drag of the drill pipe on the sides of the well hole, seal off any porous zones, contain formation fluids to prevent a blowout or loss of drilling fluid, and bring the rock chips to the surface for disposal. Various additives are used in maintaining the drill mud at the appropriate viscosity and weight. Some of the additives are caustic, toxic, or acidic, but these hazardous additives are used in relatively small amounts during drilling operations.

Eventually, the bit becomes worn and must be replaced. To change bits, the entire string of drill pipe must be pulled from the hole, in sections usually about 90 feet long, until the bit is out. The bit is replaced and then the drill string is reassembled and lowered into the hole, section by section, and drilling is started again. The process of removing and reinserting the drilling string uses much of the time required in drilling.

Drilling operations are continuous, 24 hours a day and 7 days a week. The crews usually work three 8-hour shifts or two 12-hour shifts a day. Pickups or cars are used for workers' transportation to and from the site.

Upon completion of the drilling, the equipment is removed. If oil or gas is not discovered in commercial quantities, the well is considered dry. The operator is then required to follow state and BLM policy procedures for plugging a dry hole. The drill site and access road are rehabilitated in accordance with the stipulations attached to the approval of the well site.

Casing and Cementing - Various types of casing are placed in the drilled hole to enhance hole integrity and to anchor both surface and subsurface drilling and production equipment. Casing is a string of steel pipe which is comprised of many lengths (about 40 feet long) of individual pipe which are "screwed" together. Casing is cemented into the well to protect against fluids or rock entering the well bore.

Surface casing which is properly set and cemented also protects surface aquifers from being contaminated by drilling and production operations. Surface casing should be set to a depth greater than the deepest fresh water aquifer which could reasonably be developed. Fresh water may exist at great depths but these aquifers are not normally considered to be important fresh water sources.

Surface casing is large enough to allow subsequent lengths of smaller casing to be set as the well is drilled deeper. Cement is placed in the annulus of the surface casing from casing shoe to ground level. This is, the entire space between the outside of the casing and the borehole wall is filled. Generally only the bottom few hundred feet of intermediate or production casing is cemented which often leaves several thousand feet of open hole behind some casing strings. Casing in open hole (uncemented annulus) is not considered adequate to protect zones of fresh water or minerals from contamination. The annulus must be properly filled with cement to provide adequate protection from inter-zonal migration.

Currently, the operator is only required to cement off "hydrocarbon bearing zones". Generally, operators define hydrocarbon bearing zones to be those zones which produce enough oil or gas to measure, therefore, some hydrocarbon bearing zones are not cemented. Production casing or liner is intended to provide a conduit for the production of oil and gas so that little or no product is lost in "up-hole zones".

Early wells had just enough casing to support a wellhead and the remainder of the hole was generally open. Improper casing and cementing allows communication between zones of hydrocarbons, salt water, and fresh water. Most standards are difficult to set in that cost is a factor and any job can be "overdesigned". Many "gray areas" exist where experts argue the merits of one design over another. One of these controversial design areas is hole size relative to casing size. It is questionable if a proper cement bond can be obtained under these circumstances. Hole deviation, depth, bore hole environment, placement of centralizers (if any), and a myriad of other factors affect the integrity of the casing and cement job. One of the most important factors influencing a "cement job" is the pumping method. Cement can be pumped and placed in any of three flow regimes: plug flow, laminar flow, and turbulent flow. The flow regime is a function of the velocity at which the slurry flows. Plug flow has a very slow velocity and takes

the most time to pump. Turbulent flow requires high hydraulic horsepower and some service companies cannot pump cement in turbulent flow under certain conditions.

Blowout Prevention - In the early days of drilling, no blowout prevention equipment was used.

Today special attention is paid to blowout prevention and much of the equipment associated with drilling rigs is for handling excess pressure at the surface. Blowout prevention equipment is tested and inspected regularly by both the rig personnel and the inspection and enforcement branch of the BLM. Reasonably good standards are currently in effect and operators are willing to follow them due to the dangerous nature of an uncontrolled flow from the well. The BLM is currently attempting to upgrade standards for blowout preventer stack tests to require full working pressure tests instead of the lower pressures currently specific in CDM 643.8.3C-8. Well trained rig site personnel are a necessity for proper blowout prevention.

Casing setting depth is also important with regards to blowout prevention. The casing shoe must be set in rock which is competent to withstand the maximum anticipated pressure to which it will be exposed.

Plugging and Abandonment of Wells - The purpose of plugging and abandoning (P&A) a well is to prevent fluid migration between zones, to protect minerals from damage, and to restore the surface area. Each well has to be handled individually due to a combination of factors, including geology, well design limitations, and specific rehabilitation concerns. Therefore, only minimum requirements can be established, then modified for the individual well.

III. Development and Production

Well Completion - Completion of a well calls for the installation of steel casing, which is cemented in, to provide stability and to protect specific underground zones. The casing is perforated into the zone or structure containing the oil or gas. The equipment installed on the casing of a producing well consists of various valves and pressure regulators which are used to control the oil or gas flow to production facilities.

Pipeline quality gas at the wellhead requires a minimum of processing equipment. As the quality of gas decreases with the increased presence of water, dissolved solids, or liquid hydrocarbons, the amount of processing equipment increases. Water or liquid hydrocarbons in the gas are removed before the gas is mixed with other gas, usually at the wellhead. If liquid hydrocarbons are present, storage facilities (tank batteries) are required for the liquids until they accumulate in sufficient quantities to be hauled out by large trucks.

Oil wells can be completed as flowing (those wells with sufficient underground pressure to raise the oil to the surface) or if the pressure is inadequate, they are completed with the installation of pumps, usually pumpjacks. Pumpjacks come in a variety of sizes, the larger ones reaching a height of 30 to 40 feet. Pumps are powered by internal

combustion engines or electric motors. Fuel for the engines may be casinghead gas or propane.

BLM regulations (NTL-4A) prohibit the flaring or venting of natural gas. In Wyoming exceptions permitted are: 1) during testing of a new well, or 2) when the amount of gas produced with the oil is so small that pipeline construction is not practical.

The production equipment (heater-treater, holding facility for production water (if any is present), and tank battery) are either paced on a portion of the location (on cut rather than fill) or located a short distance from the wellhead along the access road. Production facilities are usually painted black, silver, or with company colors, unless otherwise specified. The heater-treater and tanks are surrounded by earthen dikes to contain accidental spills. Either all the facilities may be fenced, or only the production water pit may be fenced.

Enhanced Recovery Projects - An oil reservoir typically contains oil, gas, and water trapped within fine rock pores under tremendous pressures. Because of the pressure, much or all of the gas is dissolved in the oil. "Primary drive" is by the expansion of pressurized water and gas in solution which forces oil out of the pores into the well and up to the surface. Oil flowing out of the rock drains energy from the formation; pressure in the reservoir begins to slowly decline; primary drive diminishes and the production rate falls. As reservoir pressures continue to drop, gas in the oil escapes, forming bubbles in the rock pores. This further retards the flow of oil and, in time, flow all but ceases. At this point, as much as 80 percent of the original oil may still remain in the reservoir.

To keep oil flowing, pressure is required. Pumps may lift oil to the surface, but only pressure within the reservoir can force oil into the bottom of the well bore. To accomplish this, gas may be injected; but the most popular "secondary recovery" technique is waterflooding. Water is injected into the producing formation to replace the volume of oil extracted and provides a driving force as well as maintains reservoir pressure. In reservoirs that are receptive to it, waterflooding may push out an additional 30 percent of the original oil in place. Water, which does not mix with oil, generally leaves about half the original oil behind in the form of small droplets trapped by capillary forces in the rock pores. Releasing oil that water alone will not move requires either chemicals, solvents, or heat. But, waterflooding is not a last ditch remedy applied only to dying reservoirs. Water injection wells may be drilled in newly discovered fields, along with development wells to maintain pressure as early as possible and lengthen the life of the reservoir.

Carbon dioxide (CO₂) is also injected into oil reservoirs, sometimes after waterflooding, to recover more oil. Ideally, for most efficient displacement, CO₂ should mix with the oil; but, it does this only gradually, if at all. Moving through the reservoir, CO₂ will extract some of the lighter hydrocarbons from the oil; and as it becomes enriched with these, it achieves a composition which allows it to mix with the oil. From this point on, a "miscible flood" is achieved which should displace virtually all of the oil from the rock matrix.

Among thermal processes, steam accounts for the bulk of recovered oil. Steam recovers 77 percent of all oil produced by enhanced recovery methods. Unlike chemicals, which alter the relationship of oil to the flooding medium and to the reservoir rock, steam helps heavy oil to flow by reducing its viscosity, and by thermal expansion within the reservoir. Steam distillation also assists in moving oil, particularly lighter oils.

IV. Abandonment

When work has been completed on a well, or an oil field is depleted, the abandonment of the well or field begins. On an exploration well the hole must be properly plugged and marked, and the drill site reclaimed. Oil field abandonment requires the removal of all facilities and plugging of all production wells. The area must be cleaned up and reclaimed so that potential hazards are removed and the area is again returned to full multiple use.

APPENDIX I

Formation Spring Meeting/Field Trip
May 1, 1987

On May 1, 1987 representatives from the City of Soda Springs, private concerns, industry and BLM met in Soda Springs. The purpose of this meeting/field trip was to clarify and evaluate concerns associated with Formation Springs (refer to hearing comments from Robert Kimball, Charles Trost, Ariel Larson, Mike Panting, and Clayton Schmitt, as well as letter comments numbers 23 and 24). As a group we toured the area, both private and public lands, around Formation Springs. As a result of the meeting/field trip and study reports developed on the spring, the BLM developed a proposed management prescription for the 340 acre tract of public land lying east of the spring site; please refer to Required Management Actions, Soils and Watershed section of the proposed plan.

The study reports identified above are:

1. Potential for impacts on Formation and Ledge Springs from Phosphate Prospecting Permit I-9350, Dr. Dale R. Ralston.
2. Phosphate Prospecting Permit Application I-9350, James Esget, Idaho Falls District Hydrologist.

If you are interested in obtaining a copy of these reports, please contact the Idaho Falls District.

A P P E N D I X J

Mineral Closures and No Surface Occupancy Areas, Alternative B.

Table J.1 lists all the closed areas in the proposed plan. To use this table, the reader should refer to Maps B3 and B4.

For instance, the Downey Watershed (located about 5 miles northeast of Downey, Idaho) is number 12 on Maps B3 and B4. Referring to Table J.1, it is noted that this area is closed to all solid leasables, locatables, and mineral materials. However, area 12 is open to fluid minerals leasing with a No Surface Occupancy (NSO) stipulation.

The letters on the first page of Table J.1 refer to the reasons why the areas are closed (see second page of table). For instance, the "f" shown on the same line as the Downey Watershed means that this is a discretionary closure, an ACEC designation to protect surface resources, etc.

Table J.1 - Areas Closed to Mineral Leasing, Location, and Mineral Materials Disposal Under the Proposed Alternative, Alternative B.

Name or Designation for Restrictions	TYPE OF CLOSURE			
	Leasable Fluids	Solid	Locatable	Mineral Materials
1. Gray's Lake NWR HQ	b	b	b	b
2. Bear Lake NWR	c	c	c	c
3. Bear River Reclamation Project (Oneida Narrows Dam & Reserv.)	NSO		g	g
4. Soda Point Project	NSO		g	g
5. Last Chance Project	NSO		g	g
6. Soda Springs Project	NSO		g	g
7. Fort Hall Indian Irrigation Project (Pelican Slough and Blackfoot Reserv.)	NSO 1/		h	h
8. Gray's Lake National Wildlife Refuge	d	d	d	d
9. Indian Rocks State Park	NSO		i	i
10. Cre-Act Corp. R & P.P.			j	j
11. Fawn Mountain State Park	e	e	e	e
12. Downey Watershed ACEC/PWR	NSO	f	f	f
13. Petticoat Peak WSA	a	a		a
14. Worm Creek WSA	a	a		a
15. Travertine Park ACEC	NSO	f		f
16. Stump Creek ACEC	NSO	f		f
17. Cheatbeck Canyon RNA/ACEC	NSO	n	n	n
18. Dairy Hollow RNA/ACEC	NSO	n	n	n
19. Formation Cave RNA/ACEC	NSO	n	n	n
20. Oneida Narrows RNA/ACEC	NSO	n	n	n
21. Travertine Park RNA/ACEC	NSO	n	n	n
22. Pine Gap RNA/ACEC	NSO	n	n	n
23. Robber's Roost Creek RNA/ACEC	NSO	n	n	n
24. Communications Sites				k
25. Public Water Reserves				l
26. Historical Sites & Trails	NSO			m
27. Power Site Reserves	NSO			
28. Recreation and Public Purposes (R&PP)	NSO			

Letters refer to reasons for closure, see following page.

NSO = Open, no surface occupancy stipulation

Blank = Open to minerals

1/ - NSO on only 15,880 acres.

LIST OF REASONS FOR CLOSURE

These letters are keyed to Table J.1

- a. A non-discretionary closure. These are wilderness study areas to be managed in compliance with the BLM's Interim Management Policy and Guidelines for Lands under Wilderness Review. See page 18 of the EIS.
- b. A non-discretionary closure. This is the U.S. Fish and Wildlife administrative headquarters for Gray's Lake NWR. The land was withdrawn under P.L.O. 4596, 4/10/69.
- c. A non-discretionary closure. This is the U.S. Fish and Wildlife's Bear Lake Wildlife Refuge. It was withdrawn under P.L.O. 4415 and P.L.O. 4545. It is a highly productive waterfowl area.
- d. A discretionary closure. This is the U.S. Fish and Wildlife's Gray's Lake National Wildlife Refuge and supports the largest greater sandhill crane nesting populations in the world. The Refuge was established June, 1965 under an MOU with BIA. A critical habitat boundary has also been established under the Endangered Species Act of 1973.
- e. A discretionary closure. This is the State of Idaho's Fawn Mountain State Park and is intensively utilized by recreationists.
- f. A discretionary closure. An ACEC designation is to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes, or to protect life and safety from natural hazards. See Section 103, Federal Land Policy and Management Act (PL 94-579). The Downey Watershed Public Water Reserve (PWR) was withdrawn under Executive Order, PWR 68 dated 12/29/19, which withdrew the area from all forms of appropriation.
- g. A non-discretionary closure to mining claim locations. A discretionary closure to mineral material disposals. Reclamation withdrawls and hydroelectric power projects. Lands are withdrawn to protect water storage areas for proposed or operating irrigation and hydroelectric facilities. The Bear River Reclamation project was withdrawn by Secretarial Order of 7/15/43. There are currently 3620.46 acres under withdrawl for power projects. Reclamation and power project withdrawls are open to mineral leasing with USBR and FERC concurrence.
- h. A non-discretionary closure. There are approximately 30,772 acres of mineral estate withdrawn for the Fort Hall Indian Irrigation Project (including 9600 acres of Gray's Lake NWR). These withdrawls were authorized by Secretarial Orders in 1907, 1912, 1922, 1926, 1932, 1936, and E.O. 4474.
- i. A discretionary closure. Indian Rocks State Park is an R&PP to the State of Idaho State Parks Dept. There are 2,888 acres closed to locatable mineral and mineral materials.
- j. A discretionary closure. An R&PP to Cre-Act Corp. There are 594 acres closed to locatable minerals and mineral materials.
- k. A discretionary closure. A total of 42 individual communications sites (760 acres) are closed to mineral materials.
- l. A discretionary closure. A total of 350 acres in Shield Canyon have been classified as a public water reserve (PWR 125) and are closed to mineral entry.
- m. A discretionary closure. Segments of various historic trails, roads, and railroads have been classified as closed to mineral materials to protect the integrity of these identified cultural resource sites.
- n. A discretionary closure for proposed RNA/ACEC.

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Proposed Resource
Management Plan and Final
Environmental Impact

OFFICE	DATE RETURNED

(Continued on reverse)

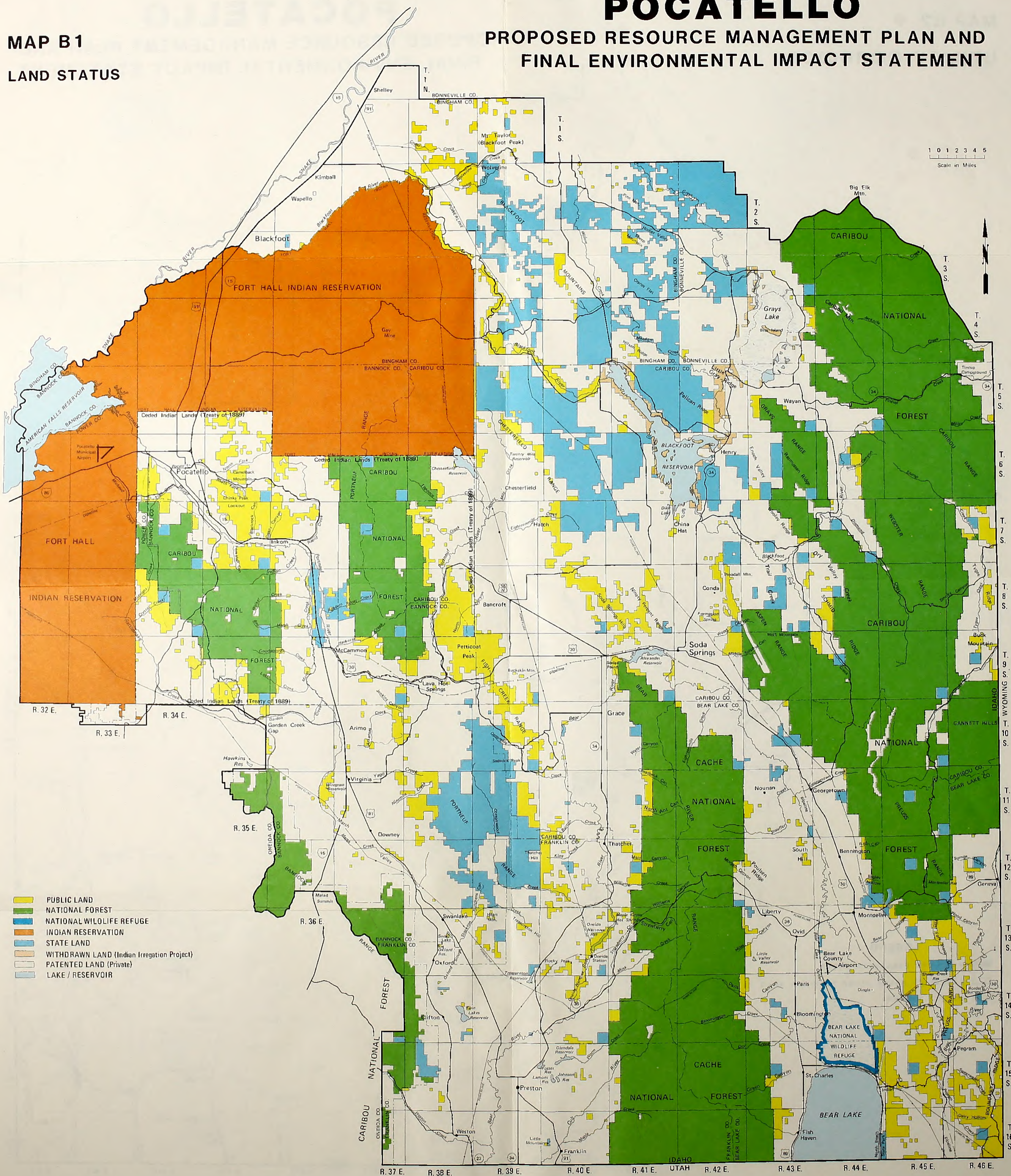
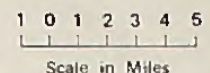
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POCATELLO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

MAP B1
LAND STATUS



- PUBLIC LAND
- NATIONAL FOREST
- NATIONAL WILDLIFE REFUGE
- INDIAN RESERVATION
- STATE LAND
- WITHDRAWN LAND (Indian Irrigation Project)
- PATENTED LAND (Private)
- LAKE / RESERVOIR

POCATELLO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT



LEGEND

- RNA/ACEC EXCLUSION AREAS
- EXCLUSION AREAS OTHER THAN RNA/ACEC
- UTILITY WINDOW

0 1 2 3 4 5
Scale in Miles



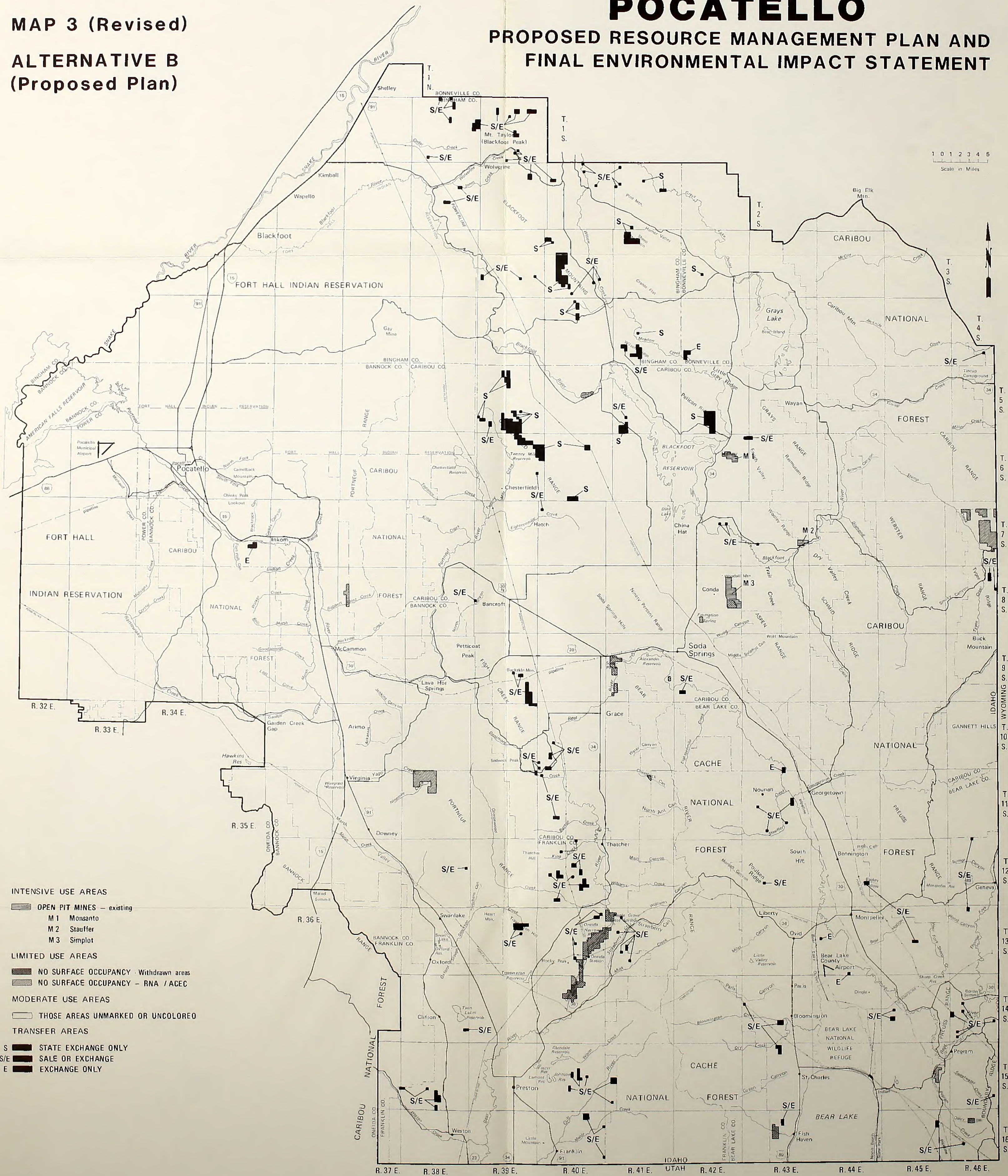
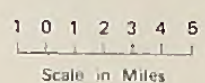
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R. 32 E.
R. 34 E.
R. 35 E.
R. 36 E.
R. 37 E.
R. 38 E.
R. 39 E.
R. 40 E.
R. 41 E.
R. 42 E.
R. 43 E.
R. 44 E.
R. 45 E.
R. 46 E.

MAP 3 (Revised)
ALTERNATIVE B
(Proposed Plan)

POCATELLO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT



INTENSIVE USE AREAS

- OPEN PIT MINES - existing
- M 1 Monsanto
- M 2 Stauffer
- M 3 Simplot

LIMITED USE AREAS

- NO SURFACE OCCUPANCY - Withdrawn areas
- NO SURFACE OCCUPANCY - RNA / ACEC

MODERATE USE AREAS

- THOSE AREAS UNMARKED OR UNCOLORED

TRANSFER AREAS

- S STATE EXCHANGE ONLY
- S/E SALE OR EXCHANGE
- E EXCHANGE ONLY

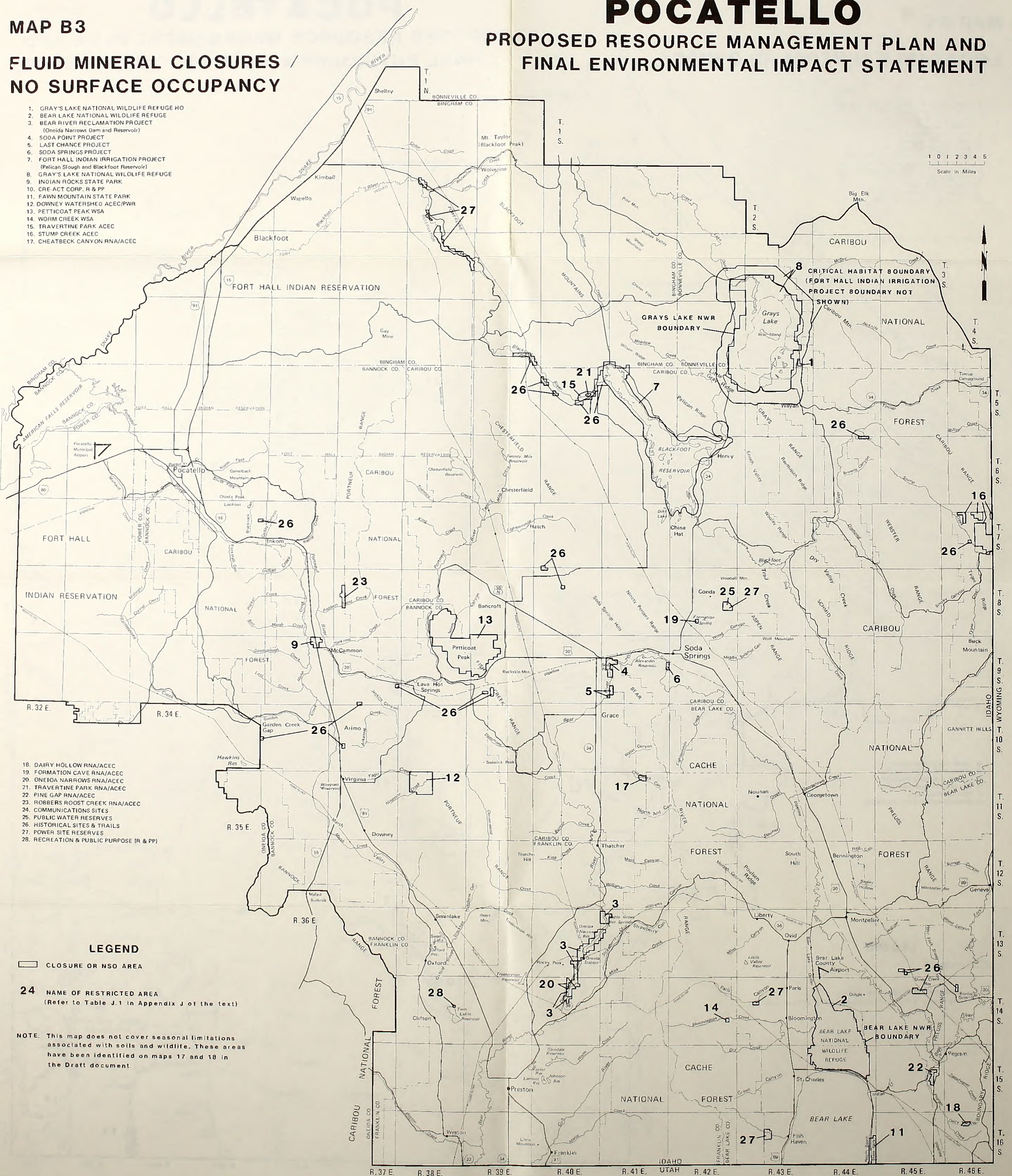
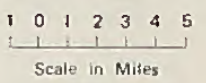
MAP B3

FLUID MINERAL CLOSURES / NO SURFACE OCCUPANCY

POCATELLO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

1. GRAY'S LAKE NATIONAL WILDLIFE REFUGE HO
2. BEAR LAKE NATIONAL WILDLIFE REFUGE
3. BEAR RIVER RECLAMATION PROJECT (Oneida Narrows Dam and Reservoir)
4. SODA POINT PROJECT
5. LAST CHANGE PROJECT
6. SODA SPRINGS PROJECT
7. FORT HALL INDIAN IRRIGATION PROJECT (Pelican Slough and Blackfoot Reservoir)
8. GRAY'S LAKE NATIONAL WILDLIFE REFUGE
9. INDIAN ROCKS STATE PARK
10. CRE ACT CORP. R & PP
11. FAWN MOUNTAIN STATE PARK
12. DOWNEY WATERSHED ACEC/PWR
13. PETTICOAT PEAK WSA
14. WORM CREEK WSA
15. TRAVERTINE PARK ACEC
16. STUMP CREEK ACEC
17. CHEATBECK CANYON RNA/ACEC



18. DAIRY HOLLOW RNA/ACEC
19. FORMATION CAVE RNA/ACEC
20. ONEIDA NARROWS RNA/ACEC
21. TRAVERTINE PARK RNA/ACEC
22. PINE GAP RNA/ACEC
23. ROBBERS ROOST CREEK RNA/ACEC
24. COMMUNICATIONS SITES
25. PUBLIC WATER RESERVES
26. HISTORICAL SITES & TRAILS
27. POWER SITE RESERVES
28. RECREATION & PUBLIC PURPOSE (R & PP)

LEGEND

- CLOSURE OR NSO AREA
- NAME OF RESTRICTED AREA (Refer to Table J.1 in Appendix J of the text)

NOTE: This map does not cover seasonal limitations associated with soils and wildlife. These areas have been identified on maps 17 and 18 in the Draft document.

POCATELLO

PROPOSED RESOURCE MANAGEMENT PLAN AND FINAL ENVIRONMENTAL IMPACT STATEMENT

LOCATABLE MINERAL CLOSURES

1. GRAY'S LAKE NATIONAL WILDLIFE REFUGE HO
2. BEAR LAKE NATIONAL WILDLIFE REFUGE
3. BEAR RIVER RECLAMATION PROJECT (Oneida Narrows Dam and Reservoir)
4. SOOA POINT PROJECT
5. LAST CHANCE PROJECT
6. SODA SPRINGS PROJECT
7. FORT HALL INDIAN IRRIGATION PROJECT (Pelican Slough and Blackfoot Reservoir)
8. GRAY'S LAKE NATIONAL WILDLIFE REFUGE
9. INDIAN ROCKS STATE PARK
10. CRE-ACT CORP. R & PP
11. FAWN MOUNTAIN STATE PARK
12. OOWNEY WATERSHED ACEC/PWR

17. CHEATBECK CANYON RNA/ACEC

18. OAIRY HOLLOW RNA/ACEC
19. FORMATION CAVE RNA/ACEC
20. ONEIDA NARROWS RNA/ACEC
21. TRAVERTINE PARK RNA/ACEC
22. PINE GAP RNA/ACEC
23. ROBBERS ROOST CREEK RNA/ACEC

LEGEND

□ CLOSURE

23 NAME OF RESTRICTED AREA (Refer to Table J.1 in Appendix J of the text)

